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*“Working to protect the
natural environment
of the Tongass,
and Sitka’s quality
of life – Since 1967”*

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ADMINISTRATIVE APPEAL OF THE LOGJAM TIMER SALE PROJECT

Mr. Bschor:

The Sitka Conservation Society submits this administrative appeal of the LOGJAM TIMBER SALE Project in accordance with the requirements of 36 C.F.R. § 215 and the content requirements of 36 C.F.R. § 215.14.

The Selected Alternative fails to adequately analyze critical issues of timber and non-timber markets and jobs, non-timber forest values, wildlife species viability and watershed health.

But most importantly, once again Tongass National Forest Leadership has missed a critical opportunity to move the Tongass management paradigm into the 21st century and address the realities of a changing social, economic, and environmental dynamic in Southeast Alaska. As the largest land owner in Southeast Alaska, the Forest Service must play a key role in helping Southeast Alaska communities meet future social and environmental challenges.

Markets:

The supply of economically-available old growth timber and markets for the same have steadily declined. The Tongass Leadership’s insistence on pushing old growth timber harvests is keeping a few communities “addicted to old growth” like nicotine keeps a smoker buying cigarettes. Focusing Forest Service staff efforts on unpopular and unsustainable management practices compromises the ability of communities to diversify their economies and take advantage of other National Forest economic opportunities and benefits, such as recreation and tourism, alternative energy, subsistence, commercial/sport/charter fisheries, and forest and stream restoration projects.

Justification for the Decision includes considering “the needs of the communities surrounding the project area” (ROD R-4) and the stated goal of the Forest Plan to “provide a diversity of opportunities for resource uses that contribute to the local and regional economies of Southeast Alaska” (FEIS 1-4). Yet



the FEIS relies on analysis of timber jobs and fails to make an adequate comparison with other resource-related jobs that will be affected by the proposed project.

The Record of Decision states that “although there are few markets in Southeast Alaska for utility volume at this time, the component may meet future needs especially if the need for alternative fuels increases” (ROD R-5). It is unreasonable to justify the utility volume of this project on a market that doesn’t exist and has not been fully analyzed. Additionally, energy from woody biomass is being evaluated as a near-to-carbon-neutral energy source as a byproduct from the second growth resource on the Tongass-- not on Old Growth. Using old-growth as a source for biomass energy would violate that low-carbon objective of biomass proposals.

A regional biomass market would require significant infrastructure investment by communities in the Tongass. Stakeholders across the Tongass are evaluating biomass along with a suite of other alternative energy solutions. Creating a premature biomass market – especially if it is based on a diminishing and long-to-regenerate resource such as old growth trees - would compromise the abilities of Tongass communities to make informed decision about future energy options

Collaboration:

Numerous stakeholders and community groups have attempted to break the cycle of appeals and litigation that have prevailed on the Tongass for several decades. These attempts have been rebuffed by the Tongass Leadership – who continue to insist on an outdated management paradigm and continued conflict.

Specific examples of attempts at collaboration include the “Jobs, Timber, and Conservation Alternative” for this project initiated at the Tongass Futures Roundtable and developed by multiple stakeholders. This alternative would have provided old growth timber volume while striving to maintain wildlife species viability. This peer-reviewed effort was informed by a multi-year, multi-agency, multi-organization professional research program. This alternative was not seriously considered by the Tongass Leadership.

Another attempt at collaboration was a Memorandum of Understanding between the Tongass National Forest and the Sitka Conservation Society. This MOU was for a discrete wilderness research project that would greatly increase the capacity of the Forest Service to meet the Chief’s Wilderness Stewardship Challenge – a national Forest Service priority. This was a project where the Sitka Conservation Society and Forest Service had 100% common ground, yet Forest Supervisor Forrest Cole refused to sign it. Once again the Tongass Leadership lost an opportunity to move beyond the timber wars of the past and foster a management paradigm more responsive to community priorities.

Community organizations have been working hard with progressive elements of the Forest Service to build collaboration from the ground up – community and field based. These efforts have provided measurable results. However, the potential of these efforts to provide regionwide results have been held back by the intransigence of the Tongass Leadership – who continue to insist on an outdated management paradigm of industrial-scale old growth logging. In their continued attempt to hang on to an old-growth logging program, the Tongass Leadership continues to divert Forest Service staff effort from projects that have much wider community and public support.



Wildlife and Watersheds:

The EIS process for the Logjam Timber Sale is woefully inadequate at addressing wildlife viability concerns, particularly for wolves. This issue is well-documented and was raised by most commenter's during Scoping and the DEIS. In the FEIS, the Forest Service attempts to avoid the requirement to conduct a Wolf Habitat Management Plan by looking for administrative loopholes to ignore the advice of a local expert on Prince of Wales Island by quibbling over whether his title at the Alaska Dept. of Fish and Game is "Research Specialist" or "Area Biologist" (FEIS B-98).

Additional concerns have been raised about species viability for the project area that have neither been adequately addressed nor analyzed. The project area has already experienced intense management. In particular, critical elevational and regional travel corridors for wildlife are in young growth condition – difficult for travel during heavy-snow winters. Many of the effective travel corridors (old-growth) around current young growth stands are slated for clearcut logging with the proposed project. This will have the effect of decreasing the mobility of wildlife during difficult winters and increasing the risk of mortality from inadequate habitat. Critical corridors have been identified in both the Sweetwater and Logjam VCUs that will be clearcut under the Selected Alternative. Both VCUs provide critical travel corridors.

Three of the twelve major watersheds in the project area are currently at or exceed the threshold of concern for cumulative watershed effects – over 20% of the watershed logged within the last 30 years. The Logjam Timber Sale Project will increase harvest levels in all three of those watersheds (Coffman, Naukati, Trumpeter) and add a fourth (Logjam) to list of those exceeding the threshold of concern.

Because of multiple wildlife and watershed issues that have been raised by a diversity of stakeholders, it is completely unreasonable for the Tongass Leadership to justify the environmental risk of the proposed project.

Summary:

The Sitka Conservation Society requests that the Forest Service halt implementation of the Logjam Timber Sale and remand the decision until the Tongass Leadership can demonstrate a commitment to sustainable management of public resources and a commitment to long-term community economic and social viability.

Sincerely,

Signature available upon request

Andrew Thoms, Executive Director
Sitka Conservation Society

