

Alaska Rainforest Defenders

A regional environmental organization established in 2011 (formerly GSACC)

Box 6064

Sitka, Alaska 99835

<https://alaskarainforest.org>



The 600' X 100' log freighter "New Face" being loaded with logs just north of the Viking Inc. mill near Klawock, on Prince of Wales Island, Southeast Alaska. Photo by Archipelagan.

ACTION ALERT CENTRAL TONGASS PROJECT DEIS COMMENT PERIOD OPEN!

The comment period is now open on the Forest Service's proposed [Central Tongass Project \(CTP\) Draft Environmental Impact Statement \(DEIS\)](#). In truth, the project is a huge timber sale and road construction boondoggle. We ask you to submit comments requesting selection of the no-action alternative and cessation of any further planning for this destructive project.

A [two part radio commentary](#) by Alaska Rainforest Defenders aired recently on Petersburg's KFSK, located in the heart of the proposed project area, and offers additional context to this Action Alert.

If approved, the Forest Service would provide the timber industry with nearly **a quarter billion board feet** of primarily old-growth and some second-growth timber, on up to 13,500 acres of logging units, to be cut over the next 15 years. This devastation would occur on Mitkof, Kupreanof, Kuiu, Wrangell, Zarembo and Etolin Islands and the adjacent mainland. The forest landscape in this part of the

Tongass is already heavily fragmented, both naturally and from decades of industrial scale logging. The logging activity would include construction of about 118 miles of new logging roads, despite the project area already having almost 1,200 miles¹ of poorly maintained national forest roads. In an attempt to sell this travesty to the public, the Forest Service has packaged this destructive activity with a minor amount of largely unfunded recreation improvements and watershed restoration—and have innocuously labeled it a "project" instead of a "timber sale project."

To put that in perspective, this single timber project would log 21 square miles of Tongass public land—nearly the size of Manhattan. It will be mostly clearcut, and converted in perpetuity into essentially a tree plantation, with greatly diminished scenic resources and biological diversity, incapable of supporting robust fish and wildlife populations, upon which we all rely on and treasure. It is a final nail to decades of cumulative losses of old-growth habitat in this major portion of the Tongass.

The quest for so-called “economic timber” (in truth it's all subsidized) is why almost all SE Alaska timber sales are now concentrated south of Frederick Sound. Any farther away from [Viking Lumber's](#) and [Alcan/Transpac Group's](#) base of operations, and it would be too expensive to set up logging camps and transport the logs to their facilities. Make no mistake, the Central Tongass Project continues the agency's singular quest to manage Tongass public lands as a subsidized timber colony for these two timber barons. The agency indulges them, in part by using a variety of tricks,² with access to more and more “economic” old growth timber. With heavy-handed pressure from Senator Murkowski pushing this along, the southern Tongass has become a de-facto sacrifice zone for the singular benefit of this small, economically unimportant industry. It's a tragic giveaway.

WAYS TO SUBMIT COMMENTS OR TESTIFY

We urge you to submit written comments or testify on the CTP Draft EIS during the 45-day comment period, ending at midnight on **September 16, 2019**. Additional points you might consider making are further below.

HOW TO SEND COMMENTS: Comments can be submitted by these means:

- (1) Online at: <https://cara.ecosystem-management.org/Public/CommentInput?project=53098>.
- (2) By FAX to: (907) 772-5995
- (3) By email to: commentosalaska-tongass-petersburg@fs.fed.us;

¹ That's more than the distance from Sante Fe, New Mexico to Seattle, Washington.

² Including relaxation of scenic quality and karst standards, land exchanges over time, diminished oversight, transfers of administrative power, and even a current proposed rewrite of the National Environmental Policy Act, to name but a few.

(3) By mail to: Petersburg Ranger District, c/o Carey Case, Project Leader, P.O. Box 1328, Petersburg, Alaska 99833, Attn: Central Tongass Project.

(4) Hand delivered at: the Petersburg Ranger District weekdays 8:00 am to 4:30 pm, at 12 North Nordic Drive, Petersburg or Wrangell Ranger District, 525 Bennett Street, Wrangell, AK, 99929.

DETAILS ON PUBLIC HEARINGS: The Forest Service will also hold subsistence hearings and public meetings in Wrangell, Petersburg and Kake:

- Wrangell, **Tues. Sept. 3**, 18:45 to 20:30, at Nolan Civic Center, Room 296.
- Petersburg, **Wed. Sept. 4**, 13:35 to 15:00 and 18:45 to 20:30, at Petersburg Lutheran Church, 406 Excel St.
- Kake, **Thurs. Sept. 5**, 18:45 to 20:30, at the City Council Chambers.

Use your own words, but following are helpful points to make in your comments:

- **The Forest Service must comply with the National Environmental Policy Act (NEPA) by analyzing the site specific impacts of the Central Tongass Project.** Instead of the NEPA required site specific examination, the Forest Service used a new corner-cutting approach it calls a “condition based” analysis. This method contains wholly insufficient detail to analyze the site-specific impacts, not even disclosing in the DEIS where actual logging or road construction would take place, and making it impossible for the public to evaluate impacts to fish and wildlife populations and personal, sport, and subsistence uses. Nor does the DEIS provide sufficient information for informed decision-making or informed public participation. The Forest Service attempted to use the condition based analysis method during the pulp mill era, but this was solidly rejected by the courts.
- **Any further diminishment of already weak scenic quality standards is unacceptable.** In order to make the CTP timber sale more profitable for industry, the Forest Service proposes to “relax” (in truth debilitate) scenic quality standards via a Forest Plan Amendment. All of the proposed locales where scenic standards would be relaxed are high use recreation areas and/or are highly visible from routes used by independent travelers, ferries, eco-tour boats, and cruise ships. In fact, the Inside Passage is a world recognized “Scenic Byway”. The effects of this substantial corner-cutting upon the vistas and natural wealth of the project area's world-famous Scenic By-Ways and world-class recreation areas will be long lasting and cause disproportionate harm. Please tell the Forest Service to abandon this ill conceived plan to further subsidize the timber industry with this inexcusable sacrifice.
- **The proposed Central Tongass Project, together with the recently approved Prince of Wales Landscape Level Assessment, are massive old**

growth timber sales which demonstrate that the Forest Service is not honoring its commitment to a transition away from old growth logging.

In 2010 the Forest Service announced a transition away from logging old growth on the Tongass—the last forest in the nation to continue this antiquated and appalling practice. Despite a Forest Plan Amendment to that end, there is clearly no sign that this commitment is being upheld.

- **The Forest Service must implement a *funded* and comprehensive program to repair fish passage blockages along the 1,200 miles of existing road in the project area with an emphasis on repair or removal of barrier culverts and/or road decommissioning.** The project area currently contains 452 “red crossings” (blocked culverts or other blockages along the logging road system which impede fish movement). Instead of constructing additional expensive logging roads which are difficult to maintain and ultimately create new blockages, a comprehensive road repair and decommissioning program must be implemented and forward-funded before another mile of road is constructed. Salmon need every advantage they can get for reproduction and early survival, especially when Pacific salmon marine survival is in a severe downward spiral.
- **It is premature and irresponsible to forge ahead with yet another massive timber sale on heavily fragmented island ecosystems with significant ecological problems in lieu of the formal findings contained in a high level, internal 2016 Forest Service report.**³ This report reviewed the Alaska Region’s timber sale and administration processes for two Viking Lumber timber sales and found multiple counts of serious “maladministration” amounting to nearly four million dollars⁴ in taxpayer losses as well as long lasting ecological damage. To this day, those findings remain unresolved as evidenced through formal records requests. For more than three years and far more time than it took to issue the Mueller report, the agency has hidden behind several alleged investigations stemming from the report’s findings. This amounts to nothing more than kicking the can down the road. All other problems with the CTP aside, the agency must stand down until they can demonstrate that these problems have been adequately corrected.
- **The DEIS fails to adequately address the impact of climate change in relation to the CTP.** Lastly, and most importantly, the CTP makes no sense

³ "Washington Office Activity Review of timber sale administration, sale preparation, stewardship contracting, nepa and timber theft prevention: Region 10". June 12-20, 2016. https://www.peer.org/assets/docs/fs/4_3_17_Timber_Sale_Review.pdf

⁴ \$2 Million for the Tonka Timber Sale: https://www.peer.org/assets/docs/fs/4_3_17_Post_Harvest_Monitoring.pdf and \$1.7 million for the Big Thorne Timber Sale: https://www.peer.org/assets/docs/fs/4_3_17_Timber_Sale_Review.pdf

during a time when the impacts of climate change have already reached a level of extreme danger in Southeast and around the world. Changes, being triggered now, will be irreversible at least for many human generations if not far longer, and we face an existential threat. The Tongass sequesters more carbon than any other forest in the nation, public or private. It should be allowed to do what it does naturally and at no charge when left standing. The Forest Service gave only lip service to this important issue in its CTP “analysis”.

For the above reasons and many more, the Tongass National Forest should choose the Central Tongass Project’s No Action Alternative. Too much is at stake to risk the huge impacts of yet another massive timber sale on the Tongass.

~Thank you for your support~

Alaska Rainforest Defenders