

ALASKA LEGISLATURE COMMITTEE FILES 1980-1980 80/2

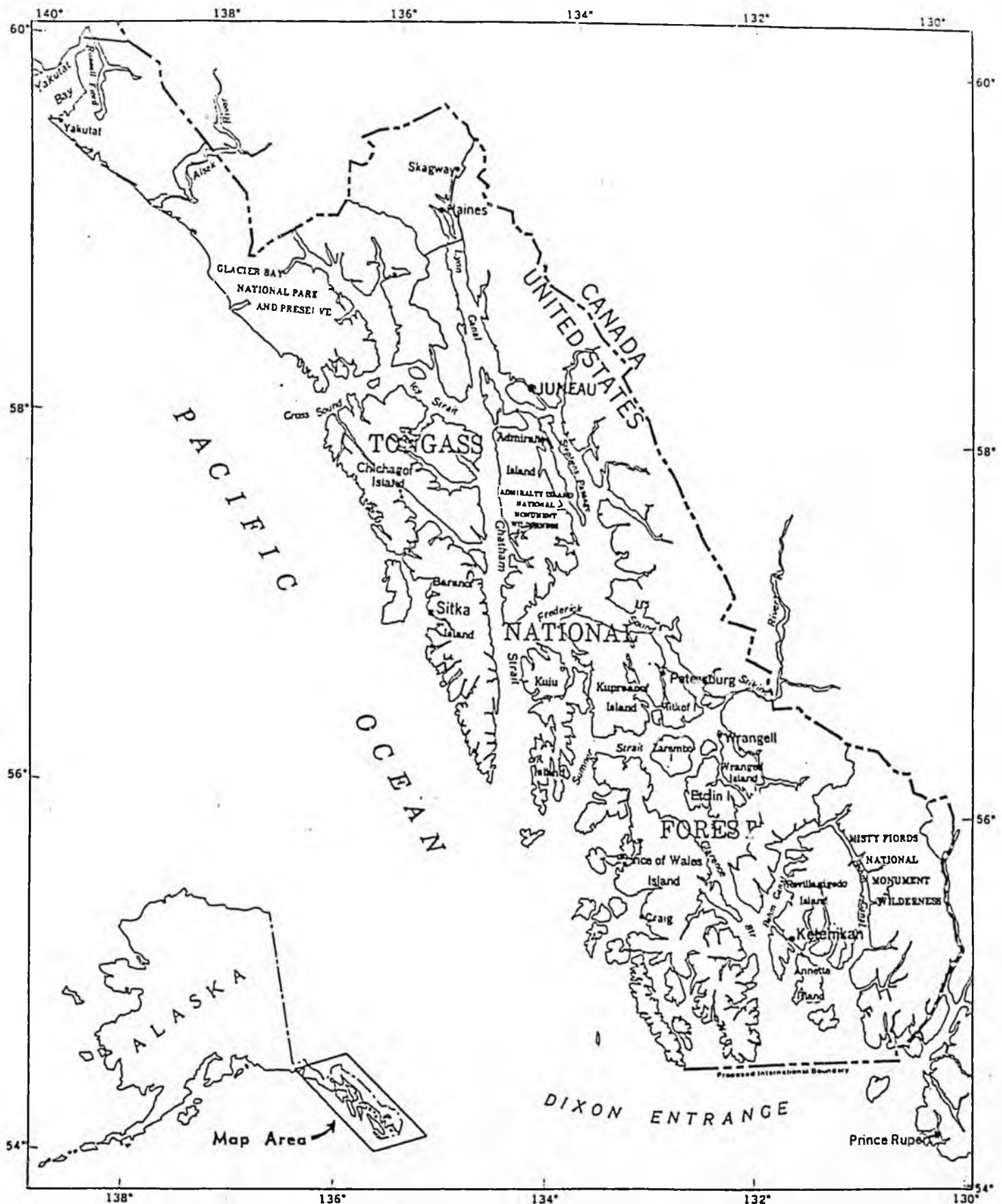
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# MAP OF SOUTHEAST ALASKA



(This map and all other graphics courtesy of the U.S. Forest Service.)

## PREFACE

In 1980, the Ninety-Sixth Congress passed the Alaska National Interest Lands Conservation Act (ANILCA). As part of that settlement of the status of Alaska's federal lands, Congress determined that the Forest Service should implement its newly created Tongass Land Management Plan (TLMP). However, because TLMP was only an interim plan, based on many unproven assumptions, Congress also reserved ultimate review over implementation of this plan. The Status of Management on the Tongass National Forest report to Congress is a part of the review process established by Section 706(b) of ANILCA.

The Southeast Alaska Conservation Council (SEACC) is a region-wide coalition of local organizations and individuals dedicated to the wise use and conservation of Southeast Alaska's precious natural resources. SEACC was recognized in ANILCA as the representative for conservation interests for the ANILCA Section 706(b) review process. To that end, SEACC originally completed this paper as a chapter for the 706(b) "Status" report to Congress which included three recommendations for bringing Tongass management back into a reasonable balance of multiple use.

At this time, we would like to point out that the "status of management on the Tongass National Forest" is a sweeping topic. Because of space constraints, SEACC has deliberately omitted discussion of current problems with mining, Stikine River region transportation access, and wilderness management on the Tongass. Instead, we have kept our focus on timber related issues.

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# Introduction

*Previous Page: OLD GROWTH understory, Tongass National Forest.*

CALL TO ACTION !!!

TONGASS LAND MANAGEMENT PLAN AMENDMENT:

The Forest Service Is Proposing To Change The Tongass Land Management Plan

YOU CAN HELP DETERMINE THE FUTURE OF THE TONGASS:

Your Comments On The Amendment Are Important and Needed

The Tongass Land Management Plan guides management of the forest for the years 1979-1989. In 1985, the Forest Service evaluated its performance in the task of carrying out the Tongass Plan. The Forest Service admitted in its 1985 evaluation what most of us already know, namely that there are serious problems in Tongass management. But the agency has since backed down from requiring correction of most of these problems before revision of the entire Tongass Plan in 1989, if ever.

Instead of dealing with current serious Tongass problems, the Forest Service has proposed an amended schedule of management activities, many of which are new. The amendment would call for the logging and roading of 302 value comparison units (watersheds), the building of at least 1680 miles of roads, and the establishment of an untold number of log dumps. All of this would be undertaken from 1985-1989, and beyond.

The time to oppose these new threats to key fish, wildlife, recreation, and subsistence resources is NOW. The time to force the Forest Service to come to terms with bigger Tongass troubles is NOW. THE TIME TO WRITE YOUR LETTER IS NOW.

WHAT'S AT STAKE:

Some critical areas slated for logging or roading by the proposed new schedule are:

- |                       |  |
|-----------------------|--|
| * Yakutat             | * Castle River                           |
| * Kadashan            | * Etolin Island                          |
| * Berners Bay         | * Woewodski Island                       |
| * Chuck River         | * Kuiu Island                            |
| * Lisianski River     | * Crittenden (Wrangell Backchannel)      |
| * Upper Hoonah Sound  | * Kosciusko Island                       |
| * Mt. Edgumbe         | * Honker Divide                          |
| * Duncan Canal        | * Salmon Bay (Salmon Lake)               |
| * Cleveland Peninsula | * Calder Mountain                        |
| * Revilla Island      | * Mansfield Peninsula (Admiralty Island) |
| * Port Protection     | * And Others                             |

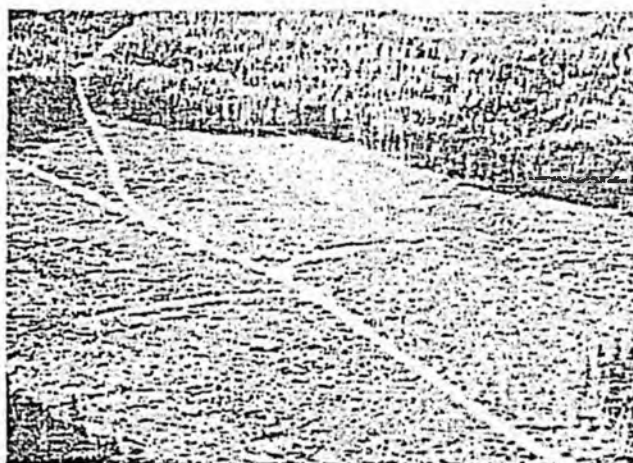
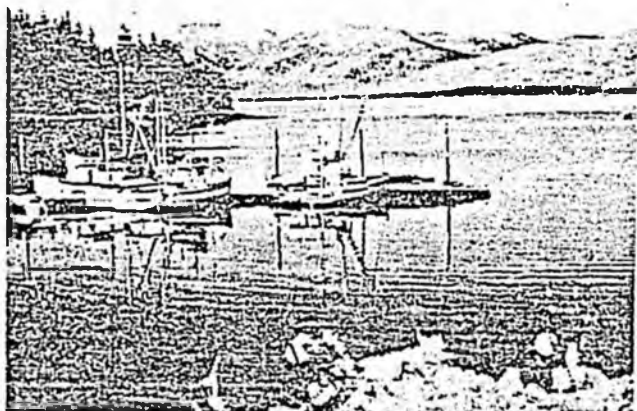
KEY POINTS OF SEACC'S POSITION ON THE TONGASS LAND MANAGEMENT PLAN AMENDMENT:

- \* Amendment must be preceded by a full environmental impact statement because activities in the proposed new schedule will have major impacts on the Tongass. The Forest Service maintains that the impacts from new logging and roading described in the plan will be "insignificant."
- \* Amendment must consider deferral of logging, roads, and log dumps in more of the Interim Protection Areas requested by SEACC, the Alaska Department of Fish and Game, or the public at large. The Forest Service claims it is protecting 85% of SEACC's deferral requests and 70% of Fish and Game's deferral requests, but both of these figures include many areas never scheduled for development. In truth, the Forest Service is protecting only about half of the Interim Protection Areas that are actually threatened.
- \* Amendment must take into account the changing management situation since 1979. New studies show the devastating impacts of logging, roads, and log dumps on fish and wildlife habitat. New studies also show that timber demand is half of what the Forest Service predicted, that tourism and recreation are growing rapidly, and that the public wants more areas left in a primitive roadless state. But the Forest Service ignores these new studies in the proposed amendment.
- \* Amendment must incorporate changes required by the 1982 National Forest Management Act regulations. The Forest Service promised to bring the Tongass Plan up to legal standards by 1983, but now refuses to uphold that promise.
- \* Amendment must disclose the Forest Service's overall Forest Transportation Plan. The Forest Service has steadfastly refused to unveil its massive road plans to the public.

Box 1692  
Juneau, Alaska • 99802  
Southeast Alaska Conservation Council



TELL THE FOREST SERVICE HOW YOU WANT THE TONGASS MANAGED!



WHAT YOU CAN DO ABOUT TONGASS MANAGEMENT PROBLEMS:

Write a Letter to the Forest Service:

- 1) Supporting the key points of SEACC's position on the proposed amendment of the Tongass Land Management Plan; and
- 2) Opposing logging, construction of logging roads or log dumps, or other destructive actions in key fish, wildlife, recreation, or subsistence areas, including the areas listed here and any other areas you care about.

Send your letter by FEBRUARY 24 to:

Mr. David A. Heerwagen, Director  
Planning Programming and Budget  
U.S. Forest Service  
P.O. Box 1628  
Juneau, AK 99802

HOW TO FIND OUT MORE ABOUT FOREST SERVICE PLANS:

Ask for a copy of the Tongass Land Management Plan Amendment by writing to the U.S. Forest Service address above or calling (907) 586-8884.

As always, please feel free to call or write SEACC if you need help in writing your comments or need more information:

Southeast Alaska Conservation Council  
P.O. Box 1692  
Juneau, AK 99802  
(907) 586-6942

HURRY! COMMENT DEADLINE IS FEBRUARY 24th!!

## INTRODUCTION

As the raven flies, the Tongass National Forest measures some 500 miles, stretching across the mountainous islands of the Southeast Alaska archipelago. Encompassing nearly 17 million acres, the Tongass is our nation's largest public forest reserve, three times larger than any other national forest.

The Tongass is a magnificent coastal rain forest, comprised primarily of huge Sitka spruce and western hemlock which have taken hundreds of years to attain their maturity. Younger trees flourish under the sheltering canopy of the giants, forming a steady-state mosaic of old-growth forest, unchanged since the retreat of the Ice Age. Ancient and dynamic, the Tongass represents a last refuge of old-growth forest, a living museum of the "forest primeval" that once extended from northern California to Alaska.

Over one hundred years ago, John Muir explored Southeast Alaska in a Tlingit Indian canoe and described the grandeur of the Tongass as an "endless rhythm and beauty." Today that endless rhythm and beauty is threatened with destruction. The Tongass is not only our largest, but also our most mismanaged and most abused national forest. This abuse has reached crisis proportions in the last six years.

The source of this abuse is a U.S. Forest Service timber management program intended to liquidate virtually all the unprotected old-growth forest on the Tongass within the next century. Like the world's other great rain forests, the Tongass is rapidly being consumed by clearcut logging and by construction of logging road networks through one undisturbed valley after another. The agency plans to cut the heart out of this forest. Once it has been logged, old growth is lost forever. It is not a renewable resource.

Furthermore, the economics of the Forest Service's Tongass timber program make no sense. Logging has always been a losing proposition in the Tongass, but with implementation of TLMP and ANILCA Section 705 the situation has attained ludicrous proportions. The Tongass timber program now costs the government well over \$60 million per year. The Forest Service is wasting additional millions per year offering unwanted timber sales and building unneeded logging roads. Altogether, the Tongass is the National Forest System's worst timber management investment.

The prime beneficiaries of the massive Tongass logging subsidy are not local loggers, but two multi-national logging companies -- Alaska Pulp Company (APC), a Japanese consortium, and Louisiana-Pacific Ketchikan (LPK), the largest purchaser of federal timber. As holders of unprecedented long-term, 50-year logging contracts, these two companies control virtually all logging on the Tongass, to the exclusion of smaller, independent timber operators. In 1981, after passage of ANILCA, these two companies were found guilty of anti-trust violations that forced local, small logging companies out of business. Now APC and LPK are asking for even more money, for even bigger subsidies.

Current large-scale logging of the Tongass severely threatens the incredible wildlife, fish, and wilderness resources that set the Tongass apart as a special national forest. Brown (grizzly) bears, bald eagles, Sitka black-tailed deer, mountain goat, moose, and other animals depend on undisturbed old-growth forests for their habitat. The countless rivers, lakes, and

## Introduction

estuaries of the Tongass rain forest harbor an abundance of salmon, trout, and char which require clear-flowing, sheltered waters in which to spawn. Finally, the cathedral-like stands of old-growth trees found in the Tongass, nestled in river valleys between mountain peaks on remote islands, represent a unique attraction to people from all walks of life from all over the world. Unless destruction of these areas in the Tongass is halted, all this will be lost.

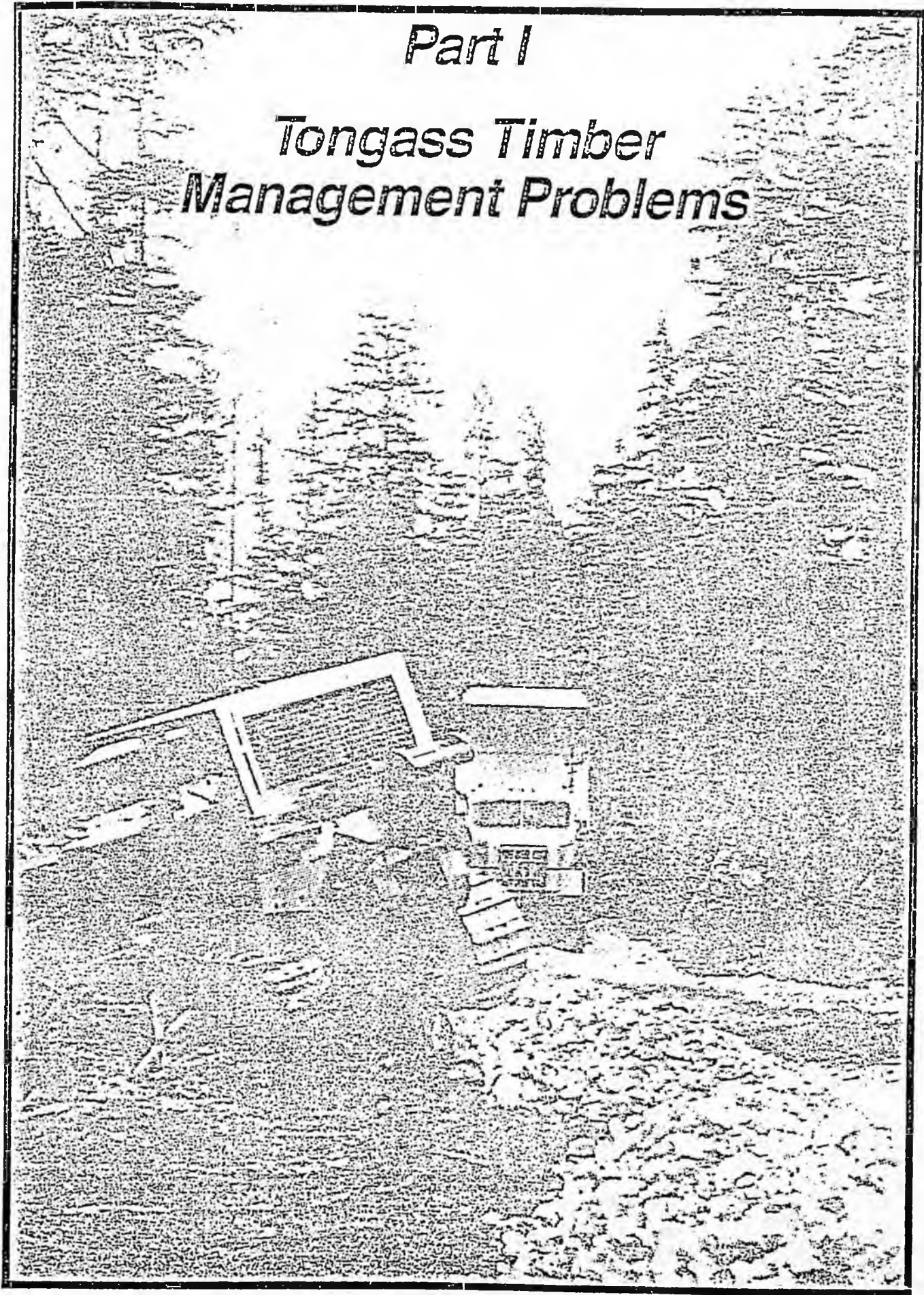
Forest Service plans are to clearcut an average of 20,000 acres and build 300 miles of road annually, for year after year. With the current 100 year rotation plan, this means a clearcut total of 2 million acres of Tongass forest. The Forest Service likes to point out that this is a small percentage of the Tongass, but on a national perspective this equates to an area roughly the size of one Yellowstone National Park, or three Yosemite National Parks, or four Great Smoky Mountain National Parks.

Since ANILCA, there have been great changes in Southeast Alaska. The market for Tongass timber has declined from all time highs reached in the late 1970's, and is now much closer to its long-term average level, which the Forest Service characterizes as depressed. Native corporation logging has become a major element of the region's timber industry. Biological research has confirmed that logging harms the wildlife and fish resources of the Tongass. Native Tlingits and Haidas and other rural Alaskans have been confronted with a rapidly changing way of life as new roads and logging encroach on their traditional hunting and fishing grounds. In addition, the fish and tourism segments of Southeast Alaska's employment base have continued to grow and diversify, adding a new dimension of stability to a frontier economy.

While it would seem natural for the Forest Service to respond to the changing situation in Southeast Alaska, this has not happened. Instead, the agency has continued on its destructive, logging-oriented course, blaming Congress and ANILCA for this policy of senseless inflexibility. The Forest Service is burdened with unprecedented 50-year timber sale contracts, by an outdated and incomplete land management plan, and saddled with the Section 705 Tongass Timber Supply Fund subsidy and timber supply goal. The agency is further hampered by its own misinterpretation of ANILCA, and has shown itself to be incapable of reform on the Tongass. As Southeast citizen, Sylvia Geraghty, has pointed out, "...they [the Forest Service] also have a contract with the American public, and I think they've failed to honor that contract." Now is the time for Congress to take action and change the course of the Tongass.

*Part I*

*Tongass Timber  
Management Problems*



Previous Page: KADASHAN ROAD in Tenakee Inlet, Chichagof Island. Despite overwhelming public opposition to the roading and logging of this prime fish and wildlife habitat area, the Forest Service proceeded with its unpopular "timber management" plans. (Photo by Bart Koehler)

## I. TONGASS TIMBER MANAGEMENT PROBLEMS

The bulk of the problems which plague the Tongass National Forest can be traced back to three distinct roots, all of which represent different aspects of the forest's timber management program. First among the sources of Tongass timber management problems is the Tongass Timber Supply Fund (TTSF) and the supply goal of 4.5 billion board feet of timber per decade, a product of ANILCA's Section 705. The second underlying cause of the timber management problems is the existence of two, long-term (50-year duration) timber sale contracts which commit vast areas of the Tongass to clearcut logging. The final cause of these timber related troubles is the utter deficiency of the Tongass Land Management Plan (TLMP), which is intended to govern management of the resources of the Tongass until 1989. Combined, these problems fuel the rampant abuse and mismanagement of the Tongass, which has reached crisis proportions today. The TTSF, the 50-year contracts, and TLMP are examined in detail in this section.

### A. ANILCA SECTION 705: TONGASS TIMBER SUPPLY FUND

#### 1. Purpose and Intent of ANILCA Section 705

When Congress debated the disposition and management of federal lands in Alaska, one of the most difficult tasks was determining a proper direction for Alaska's national forest lands. For Alaska's Chugach National Forest, Congress essentially declined to make any decision, instead deferring to the forest land management planning process. For the Tongass, however, with its already completed land management plan, Congress adopted Title VII of ANILCA which included the Tongass Timber Supply Fund provision. Because of the uncertainty attached to TLMP's assumptions, Congress also directed the Section 706(b) review process, of which this paper is a part. The inherent wisdom of taking a second look at the Tongass is readily apparent today.

Section 705(a) of ANILCA directs:

*that the Secretary of the Treasury shall make available to the Secretary of Agriculture the sum of at least \$40,000,000 annually or as much as the Secretary of Agriculture finds is necessary to maintain the timber supply from the Tongass National Forest to dependent industry at a rate of 4.5 billion foot board measure per decade....*

This is the Tongass Timber Supply Fund which made available \$53 million in 1985. The TTSF is exempt from normal appropriation scrutiny and annual budget cuts. No other national forest budget for road building and timbering is so untouchable.

The TTSF is often touted by the Forest Service and timber industry as part of a "carefully crafted" compromise with conservation advocates. This is not true. In reality, SEACC and Southeast conservationists had little or no input in the TTSF provision. SEACC didn't agree to the provision then, and we don't agree with it now. Because of the last minute nature of the development of Section 705, its true nature and intent has proved in application to be elusive, resulting in serious management conflicts.

The closed door dealing that created the TTSF left few clues as to what Congress had hoped to accomplish with this provision. However, one clear and

## 2. Misapplication and Misinterpretation of Section 705

The Forest Service's current management of the Tongass does not represent intensive forestry. Instead, it is an example of extensive forestry which is wasteful and destructive, and based on a biased reading of ANILCA Section 705. The Forest Service's annual plans for Tongass logging since passage of ANILCA have included clearcutting almost 20,000 acres per year (or 200,000 acres over TLMP's life) and building approximately 300 miles of permanent and temporary transportation network roads annually in unprotected forest lands, most of which are prime river bottoms.

Worse yet, the Forest Service has interpreted ANILCA Section 705 as a mandate to cut 4.5 billion board feet per decade, or 450 million board feet every year in perpetuity. Despite Congressman Udall's explicit direction, the Forest Service has continued since ANILCA to inflexibly offer this level of timber, much more timber than it can reasonably expect to sell, and for prices well below fair market value.

## 3. Tongass Timber Supply Fund: An Economic Disaster

Figure A shows the incredible magnitude of this oversupply of timber by Tongass planners. Since ANILCA the Forest Service has offered twice as much timber than has been harvested.

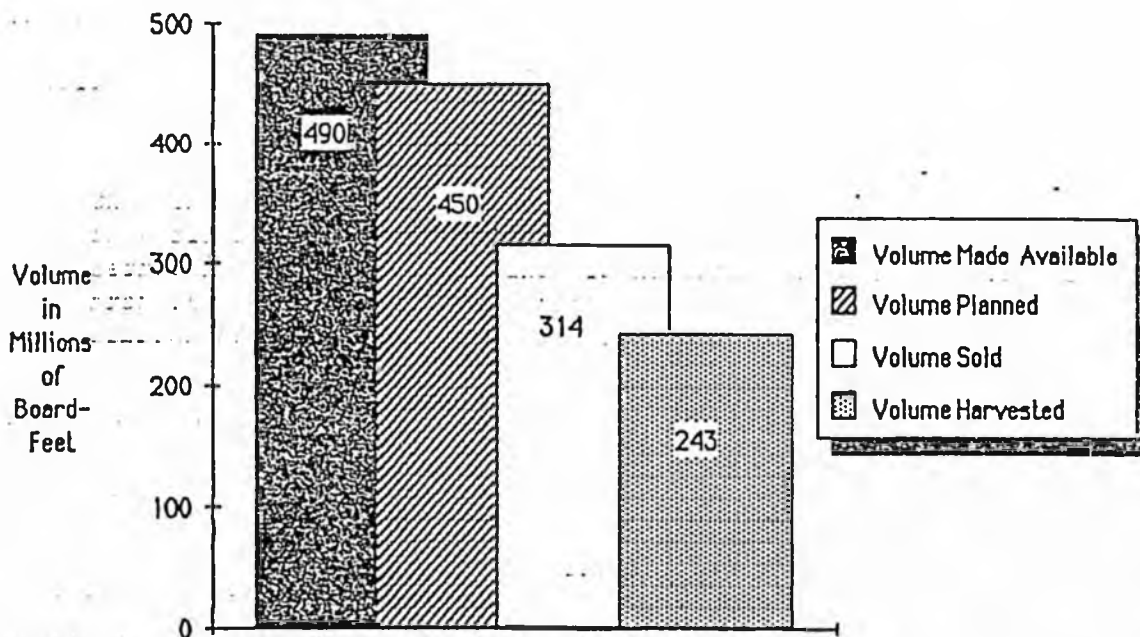


Figure A. Since 1980 the Forest Service offered, on the average, twice as much timber as was harvested.

# **CORRECTION**

**THIS DOCUMENT  
HAS BEEN REPHOTOGRAPHED  
TO ASSURE LEGIBILITY**

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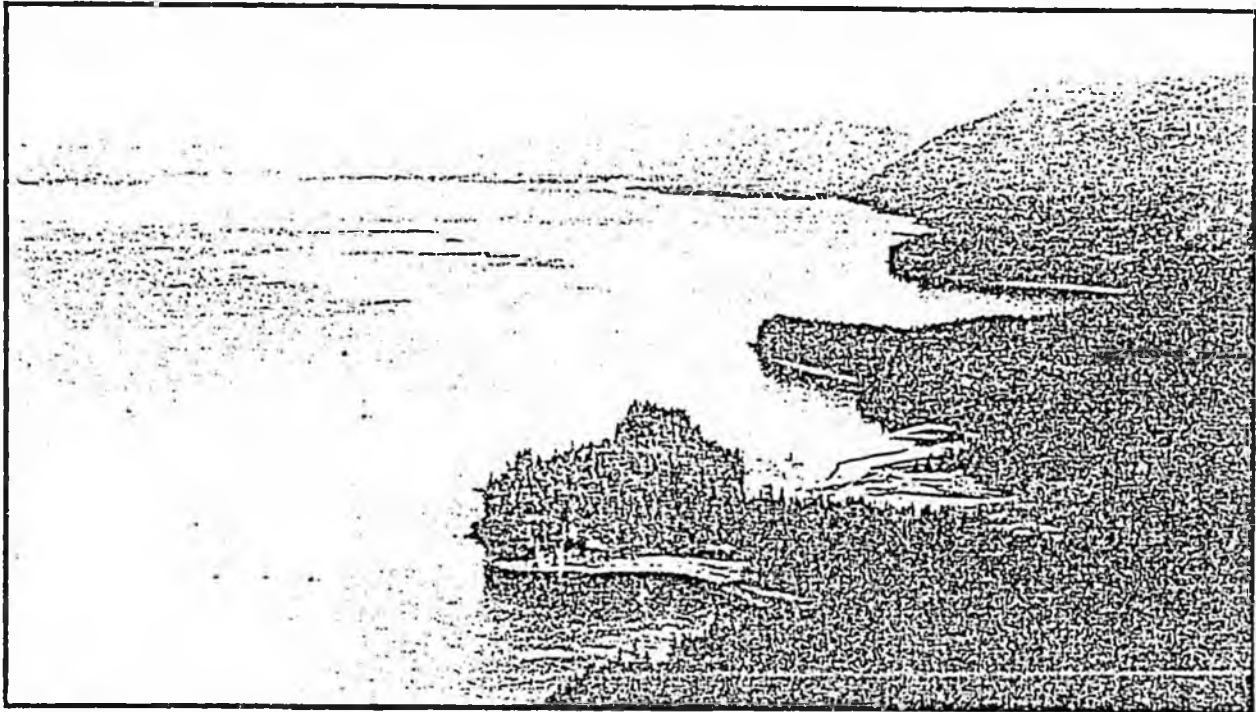
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The closed door dealing that created the TTSF left few clues as to what Congress had hoped to accomplish with this provision. However, one clear and

## Tongass Management Problems



*BERNERS BAY is slated for pre-roading even though the Forest Service itself predicts there will be no buyers for this timber offering.  
(Photo by Skip Gray)*

cogent explanation of the provision was provided by Congressman Morris Udall on the floor of the House prior to passage of ANILCA in 1980. Congressman Udall explained that the TTSF was intended merely to fund the intensive forestry provisions described in TLMP -- money that would be invested to end high-grading, to access marginal timber, and to provide extra environmental protection for other more valuable Tongass lands. Congressman Udall specifically pointed out that the Forest Service should use the TTSF "to encourage retention of old-growth forests for multiple use considerations, rather than reduce old-growth retention in order to lower costs....It is our intent to maximize protection of environmentally sensitive areas...."

Congressman Udall also explained the meaning of the 4.5 billion board foot timber harvest figure in the TTSF provision. According to Udall, this figure represented the harvest goal included in TLMP and that the section was "not a mandate to produce a specific cut level." In this statutory scheme envisioned by Congress, he said, "No more timber should be offered for sale than the Forest Service can reasonably expect to sell," and, "No more national forest timber should be supplied than can be sold at fair market value...."

From these statements it can safely be said that Congress set up the TTSF to fund a program of intensive forestry, concentrating on less valuable timber stands of lower timber volume per acre, in order to protect critical old-growth timber for wildlife habitat. Further, the TTSF provision was intended merely to fund the TLMP program, not to bind the Forest Service to a reckless pursuit of an inflexible mandate no matter what market conditions prevailed during subsequent years. Unfortunately the Forest Service has strayed far from the intent of Section 705 of ANILCA. The agency has found this a convenient shield to hide behind to avoid confronting industry on high-grading.

### 2. Misapplication and Misinterpretation of Section 705

The Forest Service's current management of the Tongass does not represent intensive forestry. Instead, it is an example of extensive forestry which is wasteful and destructive, and based on a biased reading of ANILCA Section 705. The Forest Service's annual plans for Tongass logging since passage of ANILCA have included clearcutting almost 20,000 acres per year (or 200,000 acres over TLMP's life) and building approximately 300 miles of permanent and temporary transportation network roads annually in unprotected forest lands, most of which are prime river bottoms.

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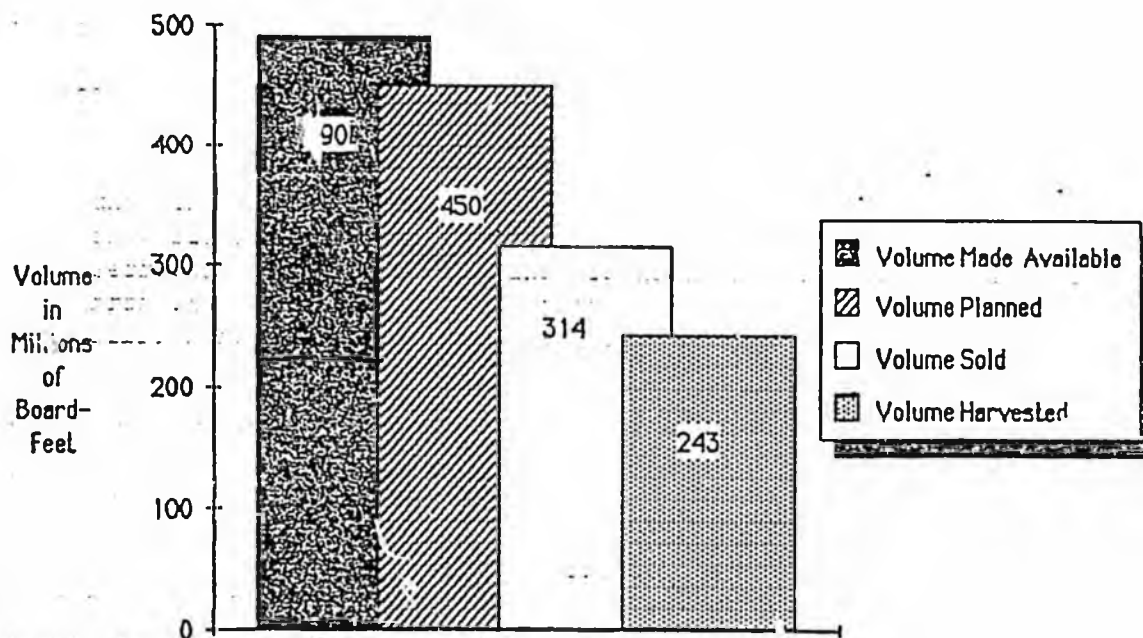


Figure A. Since 1980 the Forest Service offered, on the average, twice as much timber as was harvested.

## Tongass Management Problems

This trend, far from being a temporary or passing artifact of statistics, grows more outlandish year after year. Figure B shows the annual harvest breakdowns displayed in the Forest Service's Tongass Timber Supply and Demand Report for 1984. It shows the widening gap between Forest Service timber sale offering levels and the reality of actual timber harvest levels. Since Fiscal Year 1980 the Forest Service has offered 1.2 billion more board feet of timber than has been harvested. The cost of preparing these excess timber sales that cannot be sold has averaged over \$8 million per year, or \$40 million thrown away in the past five years on this wasteful management practice alone.

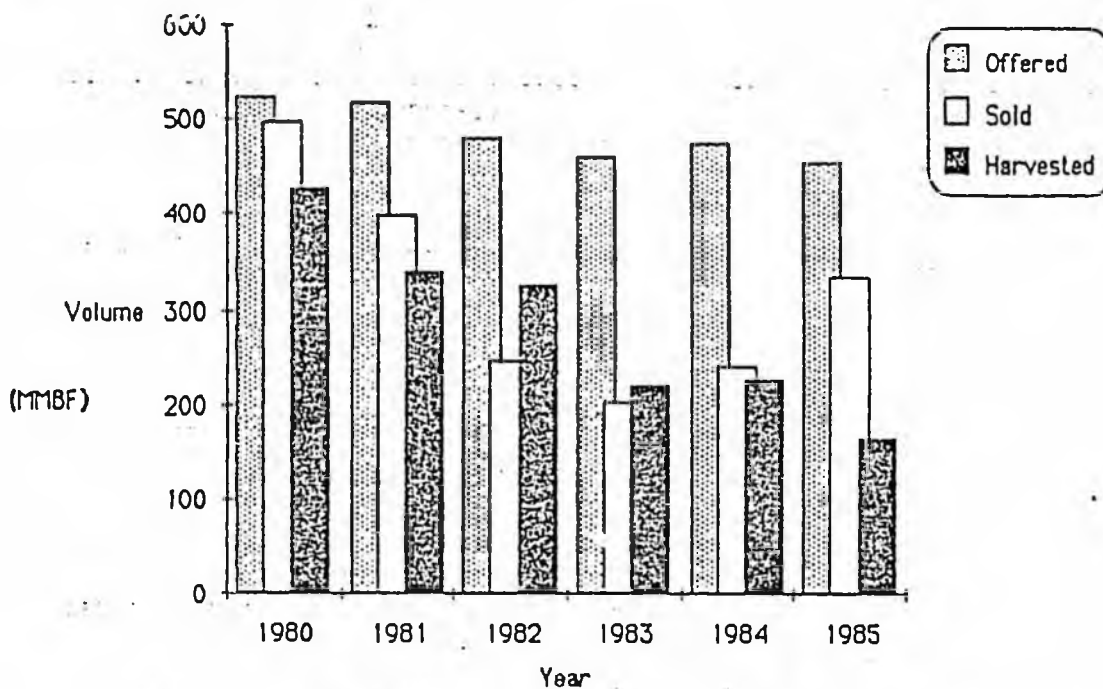


Figure B. Timber offered, sold, and harvested in the Tongass, fiscal years 1980-1985. \$40 million was wasted in the preparation of excess timber.

In the last few years, the Forest Service offered more than 450 MMBF/year, sold at least 150 MMBF less per year than planned, and at least 200 MMBF less per year was harvested than planned. In contrast, road building has proceeded at a much higher rate than planned. We have been supporting a road construction industry, not a timber cutting industry. The Forest Service is wasting money building roads to nowhere and offering timber far in excess of the market.

In 1984, the two largest purchasers of Tongass timber paid only an average of \$2.50 per thousand board feet of Sitka spruce, a species worth a hundred times more on the open market. For that same thousand board feet of spruce, the federal government spent at least \$172 to "manage" that timber. In fact, the Tongass affords one of the most striking examples of sales-below-cost (where the Forest Service spends more on the timber sale than it receives from it in revenues) in the entire National Forest System. The TTSF only compounds this unprecedented subsidy to dependent timber companies.

The Tongass timber program has always been a big loser. While high value spruce and cedar trees can be found in scattered stands, most of the Tongass timber is comprised of low value hemlock. Steep, rugged terrain and other geographical conditions make access to Tongass timber particularly expensive and unrewarding.

According to the Congressional Research Service, between 1970-1984 the Forest Service spent \$375 million on Tongass timber sales and has only received \$62.6 million in timber sale revenues -- a staggering \$312 million loss in just fifteen years. The Alaska Department of Revenue has noted that "there is no firm within the forest products industry that would subsidize the extraction of forest products to the degree that is the current practice of the federal government in Alaska today."

The magnitude of economic loss on Tongass timber programs has been much worse since ANILCA was passed in 1980. For example, between 1982 - 1985 the Forest Service spent \$253 million on the Tongass timber program, yet only recovered \$2.9 million in receipts. The TTSF, now \$53 million in 1985, is a major culprit in this accelerated rate of loss. Figure C depicts how this Congressional funding was spent and what that funding returned in receipts to the Treasury. Funds above and beyond the TTSF, such as purchaser credits, were also expended during this period.

These losses are not a temporary aberration. Remote from markets, high cost, low value Alaska timber is the last to be sold in a good market, and the first not to sell in a bad one. Thus, the future looks dim for a reversal of Tongass losses. Even the Forest Service estimates that its Tongass timber management program will lose over \$5 billion over the next five decades.

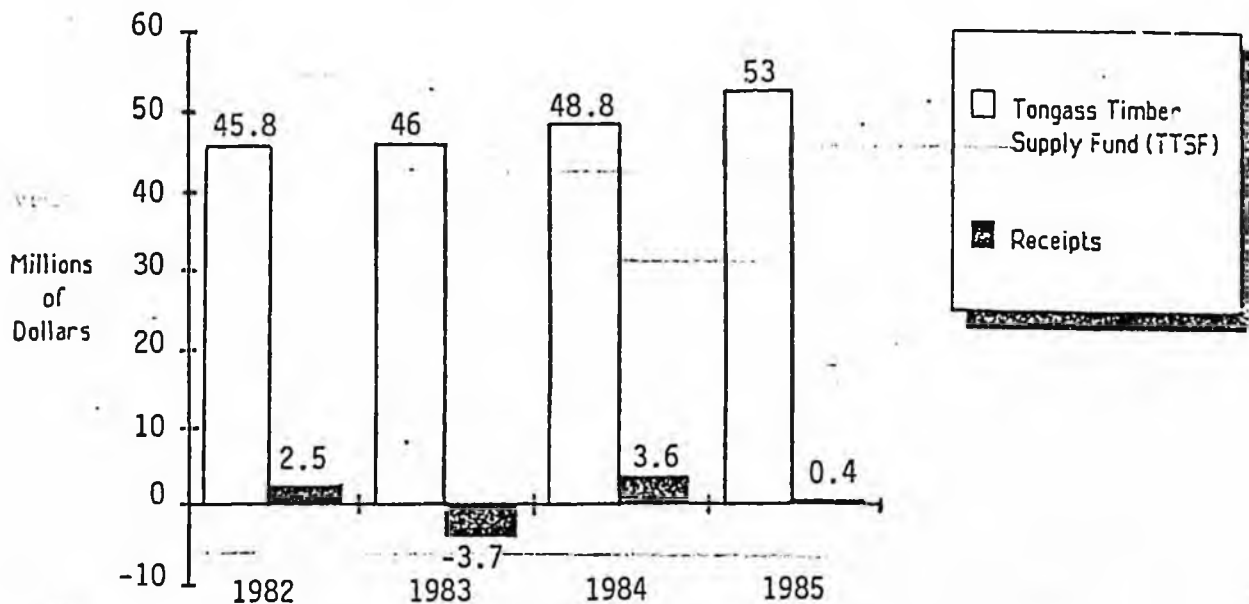


Figure C. Receipts versus TTSF Expenditures, fiscal years 1982-1985. Not shown are millions of other dollars spent on the Tongass timber program above and beyond the TTSF, such as purchaser credits.

## Tongass Management Problems

Timber program losses in the national forest have become a widespread concern, as evidenced by recent Congressional hearings on the subject. Other national forests have recently been ordered by the Secretary of Agriculture to justify timber program subsidies, but the Forest Service's interpretation of ANILCA prevents similar reform on the Tongass. TTSF funds are beyond Congressional appropriation processes or other basic fiscal controls. This results in no incentive for the Forest Service to save money -- funding of unneeded Tongass timber sales is assured no matter what the supply or market conditions might be. The Tongass' bureaucracy is not accountable.

### 4. Wasting the Tongass Timber Supply Fund: Building Roads, Building Empires

Besides spending over \$8 million a year planning, designing, and offering timber sales that are not purchased, the Forest Service has continued to use the TTSF to support an unprecedentedly large road building effort. While most road building programs in national forests are built in conjunction with timber sales, this is not the case on the TTSF glutted Tongass.

"Pre-roading" is the construction of road systems in advance of timber sales, with the Forest Service paying entirely for the project out of its timber management budget. Instead of requiring timber purchasers to pay for roads to access timber sales, or awarding timber purchasers credit for building such roads, TLMP authorized (but did not require) pre-roading of certain drainages to access marginal timber or to offset the cost of small timber sales in sensitive areas.

Unfortunately, with the TTSF available the Forest Service has undertaken a far greater roading program than TLMP planned. The Forest Service clearly regards the TTSF as a blank check to build roads and develop an extensive land transportation network on the islands and mainland of Southeast Alaska. Roads are built for timber harvesting, not for "multiple use." The following excerpt from an editorial in the "Prince of Wales' ISLAND NEWS illustrates the point: "Often we hear that the money the Forest Service spends on roads isn't to subsidize the timber industry, but to provide roads for multiple use. That sounds like a bunch of bull when you try to drive the roads and find that nothing has been done to maintain them since the last logger hauled out the last load of logs." Many Southeast communities and citizens oppose this road building, but as one Forest Service official admitted, "There's an unwritten Forest Service directive to put roads...in every available [i.e., non-wilderness] roadless drainage" by the time TLMP is to be revised in 1989, eliminating the possibility of any other new Wilderness designations.

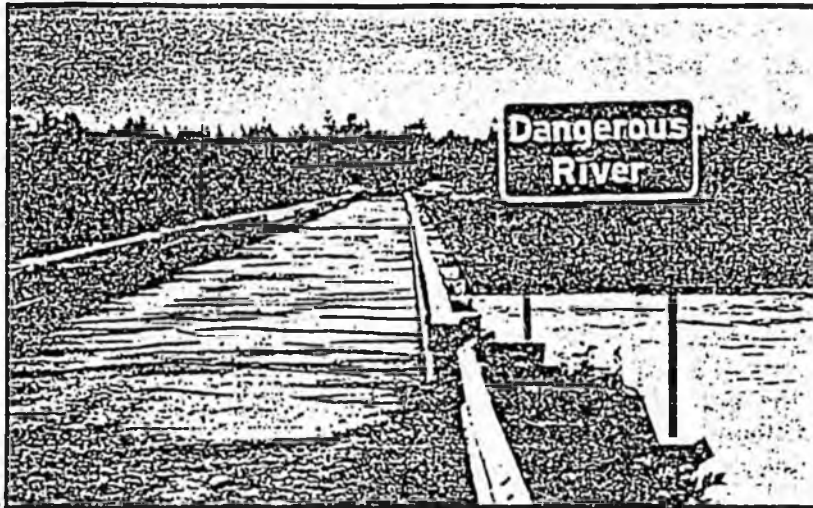
The result of such overblown plans is, of course, more waste. Roads to nowhere are increasingly common on the Tongass, since many timber access road networks are built for unmarketable timber sales. In places like Kadashan, Port Houghton, and Couverdon, miles of unneeded timber roads sit as examples of this waste. Key habitat areas in the Yakutat Forelands, Kuiu Island, and Kupreanof Island are threatened with pre-roading plans.

The TTSF is supporting a road construction program more reminiscent of the New Deal than modern forest management. One Forest Service official recently told the Juneau Chamber of Commerce that the Forest Service would be employing about twenty road workers for three summers to construct a logging road network in Berners Bay. This official neglected to mention the cost of this

subsidy -- \$5 million or about \$240,000 per job. Almost incidentally, this official did admit there was no apparent buyer for the Berners Bay timber sale, but he said the road project would provide more firewood and berry picking opportunities for Juneau residents, even if it was never used for timber hauling.

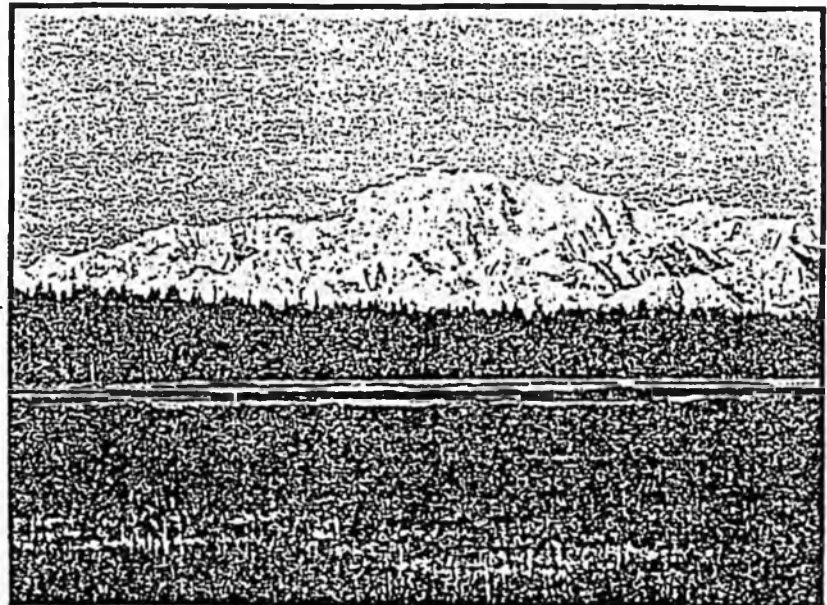
Another Forest Service timber road abusing the intent of the TTSF and TLMP is the Kadashan project. The Kadashan road was begun in 1983, ostensibly to access stands of very high volume, old-growth timber critical for subsistence, commercial fishing and wildlife. Despite Congressman Udall's direction, in Kadashan the Forest Service used TTSF money to gain access to this obviously non-marginal and environmentally critical timber. The Forest Service has followed this pattern in many other key areas.

SEACC has sued and stopped construction of the Kadashan and Berners Bay road projects, but many other similar projects are still underway or planned. The TTSF is funding make-work, de facto welfare programs, not intensive forest management.



*Left: The Dangerous River ROAD-TO-NOWHERE, Yakutat Forelands. One example of pre-roading. (Photo by Bart Koehler)*

*Right: Key habitat areas of the YAKUTAT FORELANDS are targeted for roading and clearcutting.*



## Tongass Management Problems

The Forest Service is obsessed with the language of ANILCA Section 705, language it consistently misinterprets as a mandate to offer 450 mmbf of timber per year, for all time. "Getting out the cut" or "meeting your timber targets" are the goals of many Tongass employees in all three administrative areas of the forest (Chatham Area, Stikine Area, and Ketchikan Area). For example, these quotes from timber planning documents illustrate the inflexibility of current Forest Service interpretations of ANILCA (emphasis supplied):

- \* *The need for action is the obligation to meet the Forest Service commitment, under Congressional direction...regarding the Act's mandated 450 MMBF annual timber harvest from the Tongass National Forest.*
- \* *This timber sale is offered by the U.S. Forest Service and contributes to the volume legislatively mandated by the Alaska National Interest Lands Conservation Act (ANILCA).*
- \* *Congress mandated that 450 million board feet (MMBF) of timber be sold annually from the Tongass National Forest.*
- \* *The Alaska National Interest Lands Conservation Act (ANILCA) and TLMP direct the Forest Service to sell 450 MMBF of timber per year. This proposal responds to that direction.*
- \* *The Congressional mandate included in the Alaska Lands Bill of 1980 to cut some 450 million board feet of timber annually....*

The TTSF, obviously intended to provide money to fund TLMP timber programs, is an outgrowth of one of the goals of ANILCA. In the words of Senator Ted Stevens the TTSF was to "preserve the existing timber industry." Other senators echoed the same intent: Senator Paul Tsongas said ANILCA Section 705 assured the timber industry "of a timber supply adequate to protect jobs in Southeast Alaska" and Senator Henry Jackson said that "these funds will insure that adequate timber supplies will be available to dependent industry...."

Today, timber supplies from the Tongass National Forest are far more than adequate. The Forest Service has reported this fact every year since ANILCA. Cutting levels overall are comparable to pre-ANILCA levels, as are employment figures. During the five years before ANILCA the regional timber industry employed an average of 2700 people per year in harvesting and processing, and harvested an average of 440 MMBF. During the post ANILCA period of 1980-1984, employment for the same sector averaged 2400 jobs, yet the average timber harvest for the region increased to 514 MMBF. However, the timber supply sources have changed significantly since the adoption of ANILCA in 1980. From 1959 to 1975 the Tongass National Forest was virtually the sole source of timber in Southeast Alaska. During those years the region's "timber industry" was nearly synonymous with APC and LPK who were the purchasers of 90% of the timber cut in Southeast and the producers of at least 90% of the manufactured products. In contrast today, Native corporations are annually cutting much more timber on private Southeast lands than was predicted in 1980. As a result, APC and LPK now only claim about half of the market for the region's timber. Therefore less timber is needed from the Tongass to sustain timber sector employment. Regardless of this picture, the Forest Service continues to try to sell 450 MMBF of Tongass timber a year.

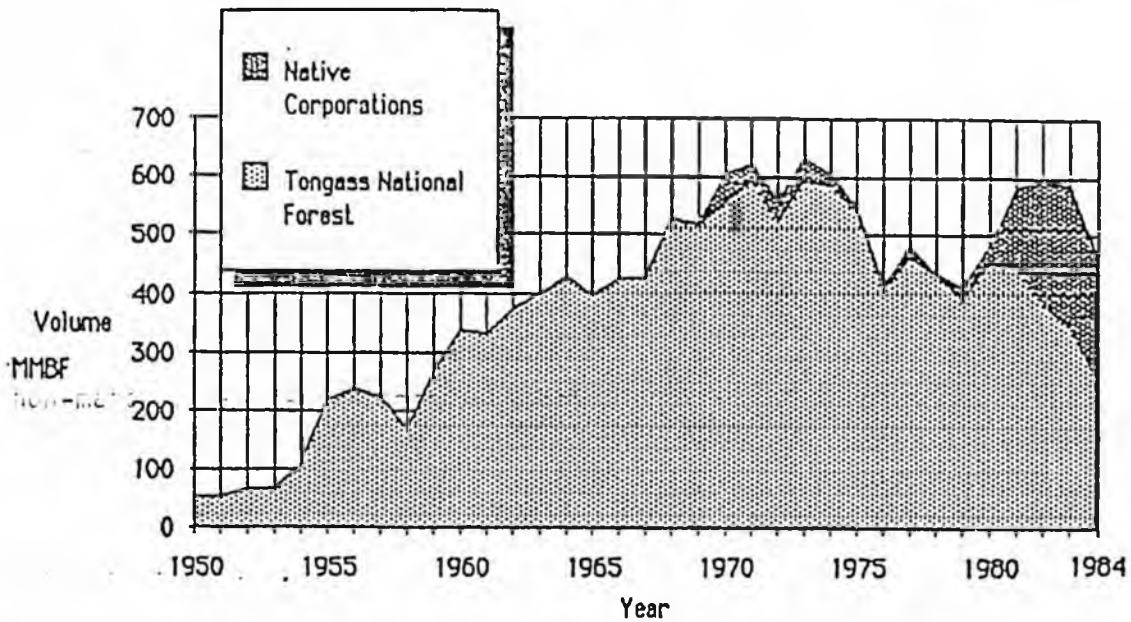


Figure D. Comparison of timber volumes harvested from Native corporation lands and from the Tongass. Timber supply sources have changed since ANILCA.

Use of TTSF funds for unmarketable timber sales and unneeded timber roads does not benefit the dependent timber industry. Except for the road contractors, beneficiaries of the Tongass timber program are difficult to pinpoint. Why then, do Forest Service officials persist in a misinterpretation of ANILCA Section 705?

A Forest Service memo provides a good clue as to why the Forest Service staunchly defends its interpretation of Section 705 and its use of TTSF funds for unneeded timber sales and roads. The memo states simply: "When Congress passed ANILCA they set up [the TTSF]. These dollars are not subject to normal appropriation rules. Most of our salaries come out of this \$40 million...." If the Forest Service only received the amount of money it needed to meet actual current timber demand on the Tongass, half of those salaries could conceivably be eliminated. Preservation of Forest Service jobs may be strong enough incentive to find a mandated harvest level in ANILCA Section 705 even where plain language, legislative history and common sense indicate otherwise.

## B. FIFTY-YEAR TIMBER SALE CONTRACTS

### 1. Background

Native Tlingit and Haida people were famous for their skills in woodcraft. With the influx of settlers from Europe, Russia, and the U.S., very small sawmills provided dimension lumber for cannery construction, townsites, and homes. Even today, all Alaskans are allowed a small annual allotment of personal-use timber for firewood, construction, trolling poles, or similar uses. But this type of small scale, selective cutting has been supplanted by two Forest Service subsidized pulp mills who hold contracts for massive clear-cutting operations lasting into the Twenty-First Century. These inappropriate and destructive 50-year contracts are the second source of Tongass timber problems.

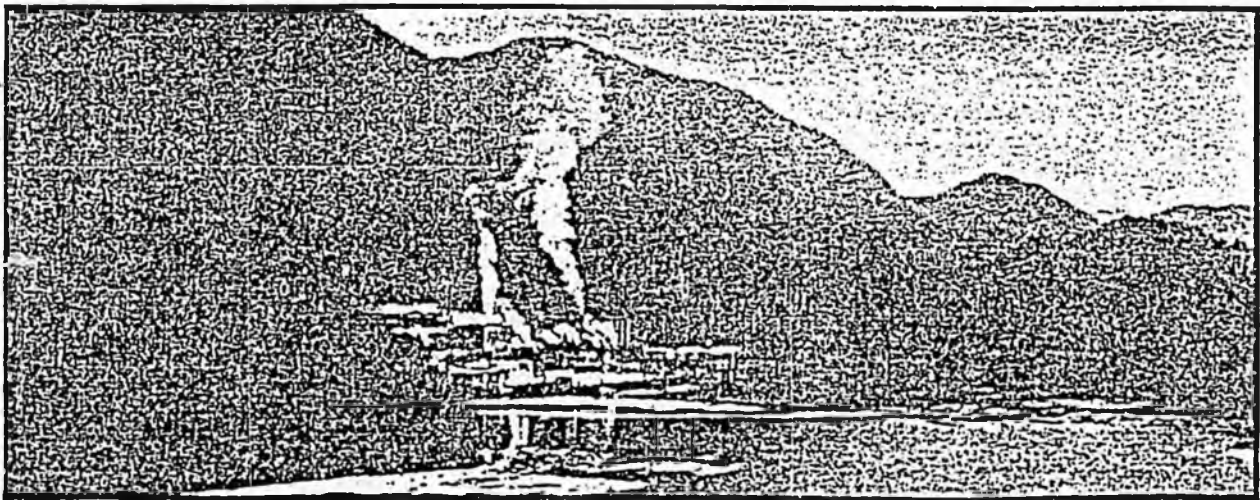
## Tongass Management Problems

A result of aggressive promotion by General Douglas MacArthur, the U.S. State Department, and some elements of the Alaska Region of the Forest Service, the 50-year contracts were designed to promote settlement of Alaska Territory and provide year-round, stable employment. More importantly, the contracts were to promote export of wood and wood pulp to Japan to help rebuild its ravaged, post-war economy. In fact, one of the 50-year contract holders, Alaska Pulp Company, is owned by a Japanese multi-national consortium of businesses. It would seem that the purposes for which the contracts were designed have been achieved, but despite this they continue in effect.

This promotion of Alaska timbering was opposed by the West Coast pulp industry and by prominent politicians such as Washington's Senator Warren G. Magnuson. In 1960, Juneau economist George Rogers viewed the situation this way:

*If we take the "nation as a whole" as our unit of primary concern and deal only in economic terms, then the [Forest Service's] policy clearly is the most shortsighted kind of silly rot. Forcing construction of new physical plants at a great cost in one part of the nation when existing plants in other areas accessible to the Region's forest resources are operating below capacity, fostering location of the processing of the raw material in a high-cost area remote from the markets, these and a whole list of other consequences could be brought forth to prove the policy guilty of creating a gross misallocation of capital and labor resources with corresponding costs to the economy of the nation as a whole.*

No pulp mills existed in Southeast Alaska in the 1950's. Since such a pioneering operation is inherently risky, the Forest Service wrote the most favorable contracts a timber purchaser could possibly imagine. The terms included such incredible provisions as: total purchaser control over selection of timber in the contract area; guaranteed annual and total volumes; carryover of unharvested timber; and modification of terms only after full agreement by the purchaser. As if this deal was not sweet enough, the Forest Service and the purchasers have agreed that inherent in the contract is a guarantee of profitable logging for the purchaser, even if the government must pay for such profits. Additionally, the contracts were designed for an unprecedented roughly 50-year duration. No other national forest in the nation is burdened with contracts of this duration (the limit elsewhere is ten years).



A 50 YEAR CONTRACT HOLDER is Louisiana Pacific's Ketchikan pulp mill.

In the 1950's, four long-term logging contracts were planned for the Tongass. In those days the Forest Service policy was to liquidate all the old-growth timber as quickly as possible. Today, in part because insufficient timber volume existed to support four contracts and in part because of diligent efforts by Southeastern Alaska conservationists, only the two 50-year contracts remain: one with the Alaska Pulp Company (APC) and the other with Louisiana-Pacific Ketchikan (LPK). Still, these two contracts commit more than one-third of the Tongass (and two-thirds of the commercial forest land) to producing a total of 13.25 billion board feet of timber as far into the future as the year 2011.

## 2. Failed Attempts at Reform

Despite changing national forest management goals and directions since the 1950's, the anachronistic 50-year contracts have continued to lumber along like dinosaurs. In 1970, the National Environmental Policy Act (NEPA) was passed by Congress in an effort to fully disclose the environmental impacts of government sanctioned projects. The Forest Service took years to apply NEPA to these contracts and then only to 5-year increments. To this date, little or no analysis has ever been undertaken of the entire fifty years of clearcut logging sanctioned by these contracts. Moreover, the attempted Forest Service NEPA analysis of the 5-year incremental logging plans has been poor at best. The cumulative impacts of these 5-year incremental plans must not be overlooked. For example, SEACC estimates that in the case of the APC contract the cumulative effects over the next 25 years will result in the clearcutting of 100,000 new acres and the construction of 1000 miles of new roads.

In 1976, amid mounting criticism of the Forest Service, Congress took a close look at national forest management and the need for reform. The resulting National Forest Management Act (NFMA) outlawed timber sale contracts of more than a few years duration, but it did grandfather the Tongass contracts. To ensure application of NFMA to these contracts, Congress added a special provision to NFMA, Section 15(b), which ordered the Forest Service to bring these contracts into full compliance with NFMA. However, the Forest Service has never accomplished this goal. - Even more incredibly, almost ten years after NFMA, the Forest Service has proposed to allow APC to continue to violate many of the terms of NFMA in its 1986-1990 logging operations.

## 3. Fifty-Year Contracts Dominate the Tongass

Because of these outdated one-sided contracts, bad planning, and failed attempts at reform, the enormous Tongass National Forest is dominated by only two logging companies, APC and LPK. These companies hold unprecedented control over the Forest Service and over Tongass resources. The Forest Service even admits that the existence of certain contract provisions "severely restricts the Forest Service from properly managing" the Tongass.

The 50-year contracts result in more than just economic waste and resource mismanagement. They give the two companies monopolistic power over timber operations on public land in Southeast Alaska. With this power, they have colluded to drive smaller, less powerful logging operations out of business and to wreak economic havoc on the few survivors. In 1981, the Reid Brothers Logging Company sued APC and LPK for conspiracy in restraint of trade and commerce and for actual monopolization of trade. The federal District Court

## Tongass Management Problems

for the Western District of Washington found APC and LPK guilty. The Ninth Circuit Court of Appeals and the U.S. Supreme Court refused to exonerate the two companies of guilt. But the damage had already been done and few small loggers survived to see the big companies' guilt confirmed. The Forest Service's own lawyers have concluded that the evidence did show that material breaches of contract had occurred.

Even more appalling in its arrogance, given the generous terms of the 50-year contracts, is the possibility that LPK and APC have cheated the Forest Service out of between \$60-82 million by price-fixing, double-invoicing, and other illegal and deceptive practices. Though the Forest Service itself estimated this magnitude of loss, it has only claimed \$9.4 million in legal proceedings thus far. Furthermore, of the \$60-82 million, one-quarter of these revenues were earmarked for the State of Alaska. This money has never been recovered. As statutes of limitations run out, these badly needed revenues are lost forever.

APC and LPK have been given additional special treatment despite such underhanded activities. In 1981 and 1982 they were granted "emergency rate redeterminations" reducing the stumpage (how much the companies pay for the timber). For LPK, all timber stumpage (except hemlock which sells for an average of \$1.50 per thousand board feet) was reduced by 96%, bringing the price down to 1951 base rates. APC's stumpages for spruce and cedar were reduced by 99% to bring them down to 1956 base rates. For instance, APC's spruce sawlogs were appraised at \$215 per thousand board feet, but they now pay only \$2.26 for that timber! Cedar appraised at over \$1000 per thousand board feet is bought by APC for \$1.22! The Forest Service is literally giving these trees away.

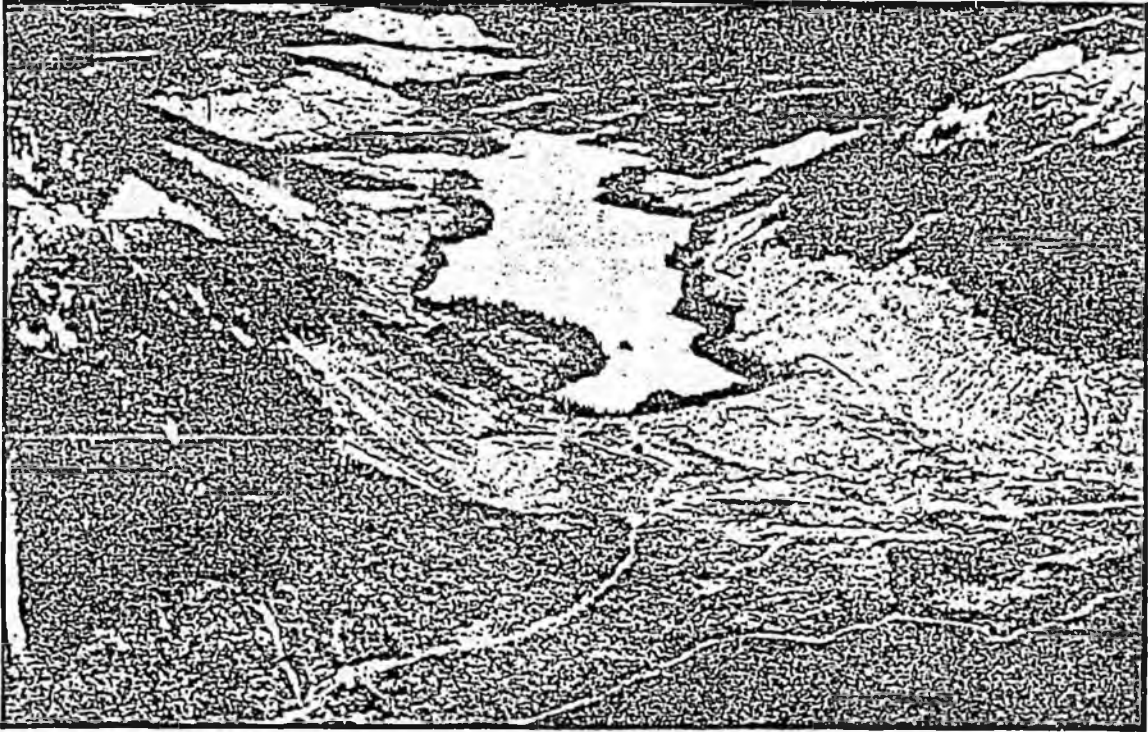
In addition to the emergency rate redeterminations, in 1984 and 1985 the Forest Service revised utilization restrictions and permitted more merchantable wood than normal to be left behind during logging operations, so that the timber brought to the mills is only the most profitable, high-quality wood. The low-value trees are left to rot on the ground. SEACC's appeal of this "bail-out" program was denied by the Chief of the Forest Service. Also in 1984 and 1985, the Forest Service waived its primary processing requirement (i.e., permitted round log export) for timber from some salvage sales.

APC's contract allows the company to selectively harvest only the high-grade stands, leaving the stands of less valuable lower-grade timber. This results in the company having a stockpile of unharvested "carryover" timber amounting to nearly 400 million board feet. The end result is the cutting of only the best and most profitable big trees, which are also the best wildlife habitat.

Some critics believe that it would be more cost effective in the long run to buy out the remaining value of the 50-year contracts and return to short-term sales, than to continue subsidizing the contracts. This would also promote a more balanced management of the forest.

As long as these 50-year contracts remain, there will be continuing waste, fraud, and abuse. The terms of the contracts themselves are the codification of unfair advantage, of monopoly. For the term of the contracts, until 2011, true multiple-use will be impossible and small logging operations will continue to suffer. Though there is ample evidence on the basis of which to

cancel the contracts, and though the government always retains authority to modify or eliminate any agreement, the Forest Service simply refuses to act to protect the resources of the Tongass. The agency is treating the Tongass like a private reserve for the benefit of these two timber companies. This is a second underlying cause of the unfortunate Tongass timber situation that exists today.



*Clearcutting within APC's 50 YEAR CONTRACT AREA on Chichagof Island.*



*Located within APC's 50 year contract area, Chichagof Island's UPPER HOONAH SOUND is slated for roading and logging. (Photo by Larry Edwards)*

## C. TONGASS LAND MANAGEMENT PLAN

### 1. Background

Since the 1950's Forest Service has had ambitious plans for turning Southeast Alaska's forest lands into a huge tree farm. Even into the late 1970's, Forest Service timber plans included virtually all of the commercially valuable timber lands on the Tongass. Extensive plans were even designed for clearcutting and roading such critical areas as Admiralty Island, which is now a national monument wilderness. None of these plans gave consideration to the need to manage national forests for a mix of resources and uses, including recreation, fishing, hunting, subsistence, and wilderness, as well as timber production.

As previously mentioned, Congress scrutinized the timber-biased management of public forest resources in 1976 and forged a comprehensive solution, the National Forest Management Act (NFMA). NFMA specifically required balanced management of national forests and also set forth a process by which detailed forest plans would be prepared in order to guarantee implementation of that mandate. Existing forest plans were allowed to continue in effect until expiration, but all forest plans were intended to incorporate provisions of the new NFMA within 10 years. NFMA set a specific deadline of 1985 for complete implementation of its provisions.

After passage of NFMA, the Forest Service began preparing regulations to implement the new law. At the same time, Congress continued the long process to resolve uncertain land holding situations in Alaska that culminated with the Alaska National Interest Lands Conservation Act (ANILCA). Disposition of national forest lands was a central issue in the ANILCA debate, and the Forest Service set out at an accelerated pace to prepare the Tongass Land Management Plan (TLMP) in an effort to guide and inform Congressional debate.

In March of 1979, TLMP was completed and circulated for public review, despite the fact that NFMA regulations were still unfinished and much of the basic information needed in order to fully understand the Tongass had not yet been researched and compiled. Though TLMP was heavily relied upon by Congress, it was based in extraordinary part on extrapolation and assumption. Given the haste with which the plan was prepared, this is unsurprising. Most other NFMA forest plans are only now being completed. Unfortunately, the Tongass is still saddled with an incomplete, inaccurate and outdated forest plan whose failings are increasingly apparent to all observers, even the Forest Service itself.

### 2. Tongass Plan Favors Logging

When TLMP was formulated, it was promoted by some as a fair compromise at land allocation and supported vigorously as such by the Forest Service. Indeed, land allocations by acreage were roughly equivalent between land to be logged and lands to remain roadless and undeveloped. Now, six years later, the land allocations can be clearly seen as a ruse.

The Forest Service claims that the "forest plan management direction includes provisions for the protection, maintenance, and enhancement of wildlife and fisheries....The designated Wilderness included 85 of 298 high value wildlife habitats and 26 of 490 high value fisheries habitats identified in the forest plan. In addition, 35 high value wildlife habitat areas and 220 high value

fish habitat areas are included in areas designated in the forest plan for roadless area management."

There are 867 watersheds in the vast Tongass National Forest. A responsible fish and wildlife management program would protect all the high value fish and wildlife habitat areas. TLMP did not do this. Instead the resultant designations for the Tongass show an appalling lack of concern for fish and wildlife protection. Of the only 298 high value wildlife areas on the forest, a mere 29% have been designated as Wilderness. Of the 490 high value fishery habitats, only 5% of these watersheds have been designated as Wilderness. The remaining areas are all open to destructive logging and roading over the long term.

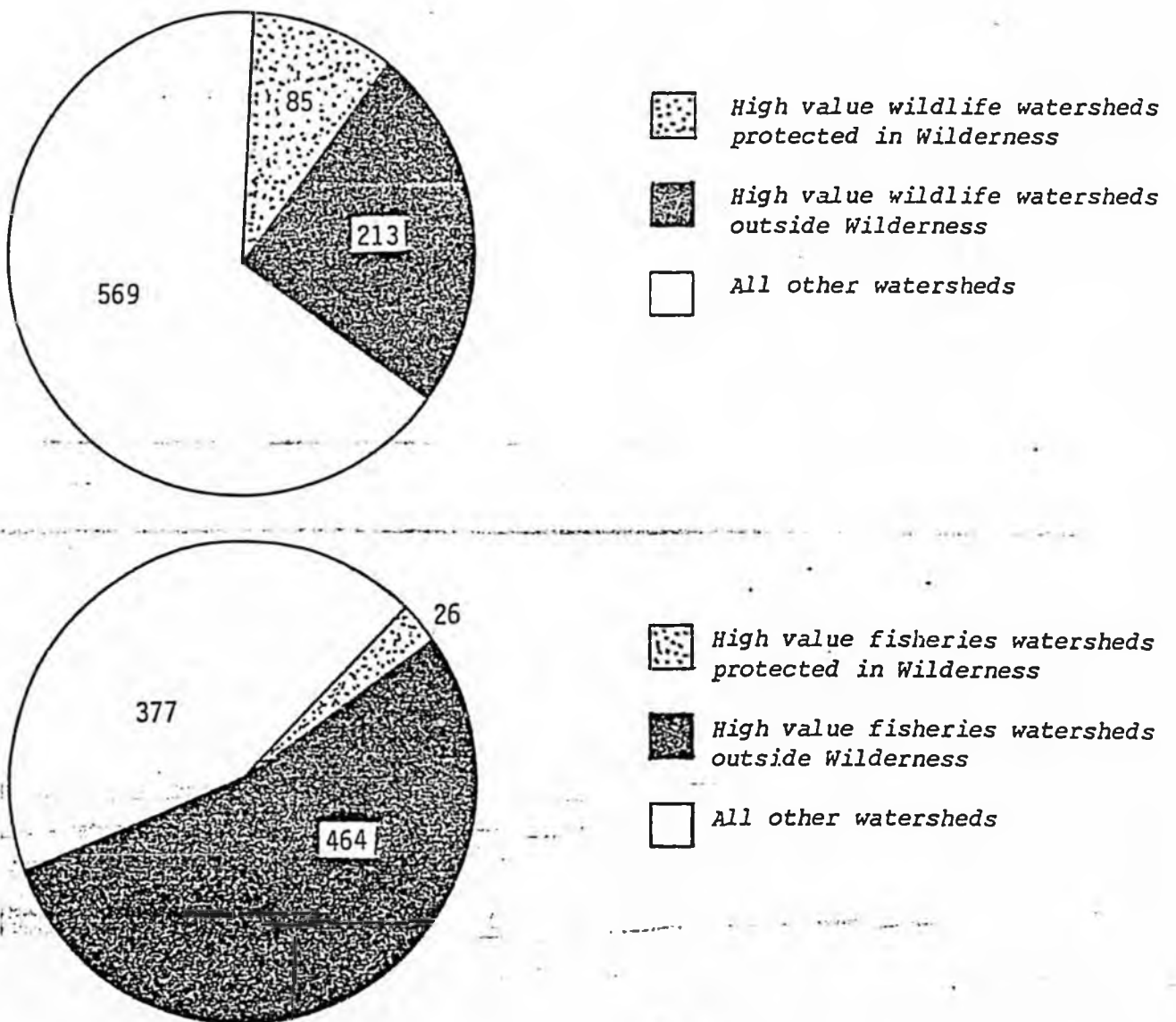
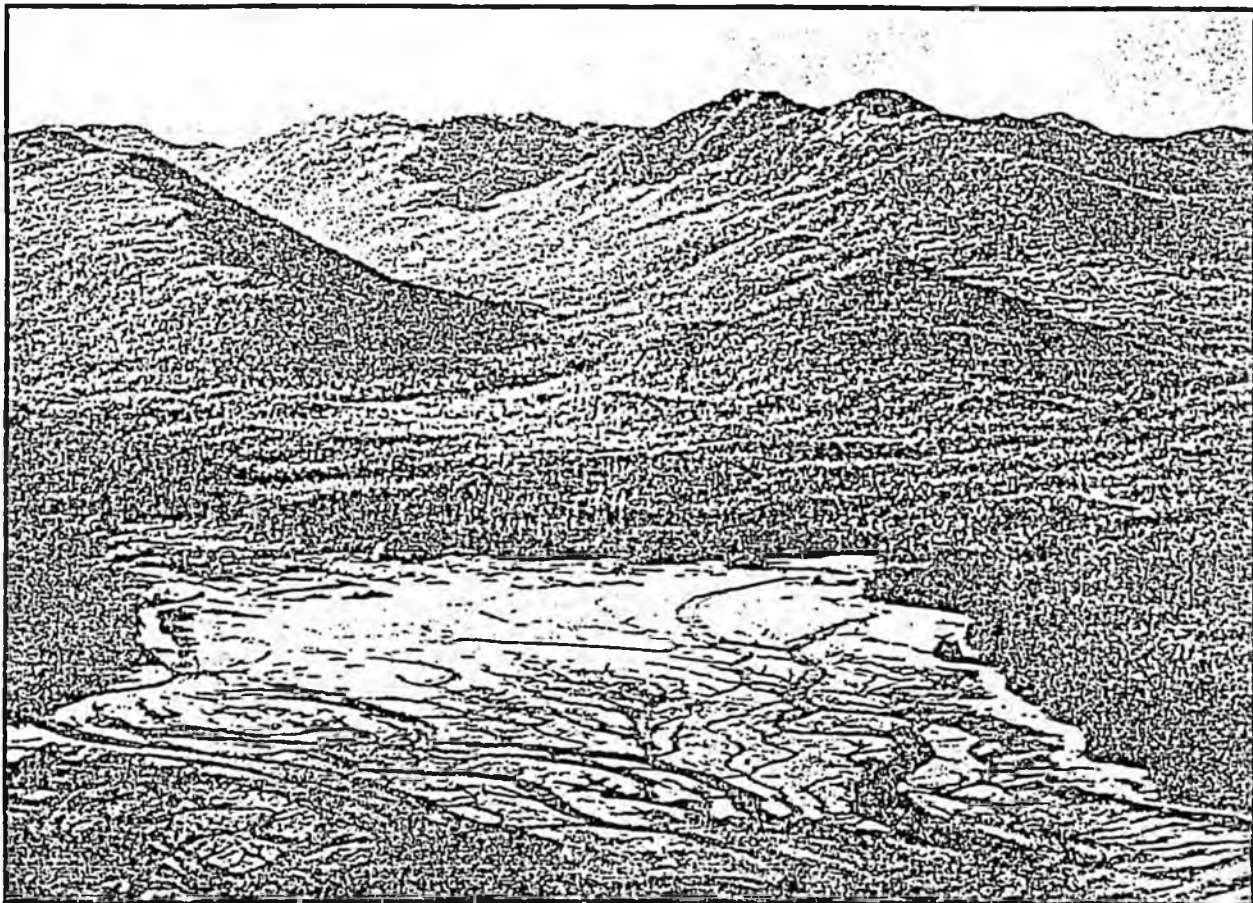


Figure E. High value fish and wildlife watersheds on the Tongass National Forest.

## Tongass Management Problems

In reality, while National Forest acres in the Tongass are roughly even in their division, the majority of valuable wildlife habitat is included in areas under a land use designation allowing logging. The Tongass lands holding the highest volume of valuable, old growth spruce and hemlock are also the most important lands for fish and wildlife habitat, yet TLMP concentrates logging in high-volume timber stands, rather than harvesting timber stands in proportion to their volume class occurrence across the Forest. This "high-grading" is built into TLMP. Former Chief of the Forest Service, John McGuire, stated that cutting more of the marginal component is consistent with the NFMA, but that the alternative, continued high-grading of the forest, is in conflict with that Act: "An over-harvest of the standard component now would eventually result in only special and marginal stands left in the forest. This type of management would not be compatible with Forest Service policy or the National Forest Management Act."

High volume timber stands, exceedingly rare in the Tongass, are scheduled by TLMP for harvest in a higher proportion than they occur in the forest. But they are being harvested at an even higher rate than scheduled. Fifty percent of the highest volume timber has already been cut and at least 75% will be cut by the year 2000 at present rates. This unsanctioned high-grading compounds the inherent weakness of TLMP.



*The KADASHAN WATERSHED, a prime old growth and fish and wildlife habitat area. Already a victim of Forest Service road building, it is one example of high volume timber targeted for clearcutting by the agency's extensive forestry management program.*

### 3. Fish and Wildlife Protection: An Empty Promise

The Forest Service has made a practice of answering fish and wildlife concerns by referring to TLMP's Land Use Designation (LUD) III, a category of Tongass management which allows logging, but theoretically protects other forest resources, including fish and wildlife habitat needs. The TLMP management scheme included other LUDs -- LUD I (wilderness), LUD II (roadless recreation), and LUD IV (intensive logging).

TLMP also set out a harvest layout scheme by which critical wildlife areas would be retained during logging in order to mitigate the impacts on fish and wildlife. This is referred to as "retention". As part of the task of defining retention areas, Tongass planning required identification and protection of Fish or Wildlife Habitat Management Units wherever logging or roading was planned.

Six years later these protective provisions have proven to be empty promises. In reality, there is little management difference between LUD III and the less restrictive LUD IV, which allows intensive logging. Retention has never been fully implemented and often only occurs by accident, when strips of timber are left standing between clearcuts. Rather than true retention areas, preserved because of habitat needs, these strips can be more accurately referred to as "leftovers". In practice, even the leftovers are often logged in subsequent timber operations. Fish and Wildlife Habitat Management Units, which would have accurately defined retention needs, are almost never developed. When they are, they always follow timber sale layouts rather than preceding placement of roads and clearcut locations. Such units are reduced, at best, to mere attempts to salve a wound already inflicted. None of TLMP's major fish and wildlife protection provisions have been implemented and damage from roads and clearcuts continues to mount.

### 4. Tongass Plan Violates Federal Laws

The authors of TLMP were well aware that draft NFMA regulations were being prepared by the Forest Service, even as they rushed TLMP into print in March of 1979. To allow them to finish TLMP, the Tongass planners promised that new NFMA regulations would be incorporated into TLMP by a major forest plan revision in 1983. Inc redibly, now in 1986, ten years after passage of NFMA, seven years after TLMP was finished and after NFMA regulations were implemented, no such TLMP revision has been attempted or completed. TLMP does not comply with NFMA regulations and Congressional forest planning reforms remain unaccomplished on the Tongass.

TLMP was rushed into print before an adequate job could be done. Under the National Environmental Policy Act (NEPA) the environmental impacts of a major federal proposal must be clearly and comprehensively displayed in an EIS. TLMP lacked both the baseline information on what Tongass resources were threatened by the logging it proposed and the information on how such logging would impact other forest resources. NEPA analysis is incomplete in TLMP.

In a recent order, the federal District Court for Alaska concluded that TLMP's environmental analysis was inadequate with regard to the impacts of a road and logging project in Berners Bay, north of Juneau. The Court's order stated that an entirely new site-specific EIS was needed for the project. Despite the

## Tongass Management Problems

proven inadequacy of TLMP, no attempt has been made by the Forest Service to improve on TLMP's cursory NEPA analysis. Nor has the Forest Service attempted to incorporate into TLMP the wealth of new information on the environmental impacts of logging and roading which has become available since 1979. This new information makes it crystal clear that Tongass timber management programs present serious threats to fish and wildlife.

### 5. Tongass Plan Direction ignored by Forest Service

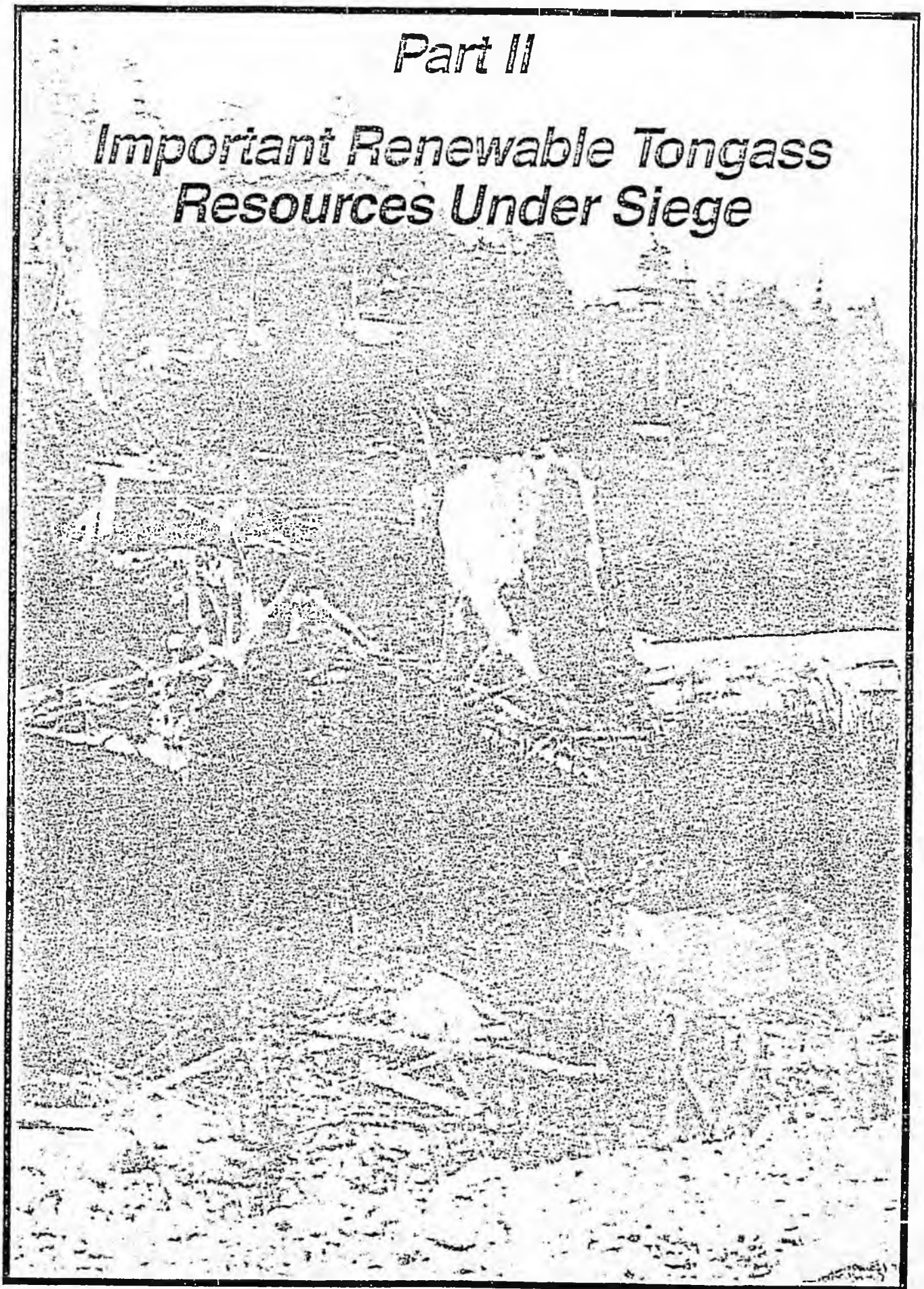
Detailed schedules for development in various management areas of the Tongass, were published in TLMP, Part II. However, road building and timber sales have failed to follow those schedules. Instead, individual forest supervisors have departed repeatedly from TLMP's program. Realizing that such departures were highly improper, Tongass planners decided last year to amend TLMP's schedules to reflect the actual development schedule, rather than bringing Forest Service activities back into harmony with TLMP. This backward approach to planning serves to underscore TLMP's failure to guide development.

Because it was a stop-gap effort at planning, TLMP deferred many integral forest plan steps to subsequent lower levels of the planning process. For example, individual Tongass management areas were supposed to be analyzed after development of TLMP, and specific resource protection standards and guidelines were to be developed concomitant with specific location of timber sales, roads, log dumps, and other such activities. This interim step in planning was also subject to full NEPA analysis, but no such analysis was ever completed for over two-thirds of the Tongass. Further, project level NEPA analysis, also envisioned by TLMP, has never resulted in site-specific environmental impact statements, even for massive projects. In the wake of the Berners Bay court order, the legality of these failures are in great doubt. It is certain, however, that the failures of these subsequent planning steps have frustrated and prevented full implementation of TLMP's intent, as well as public participation in major Tongass decisions.

TLMP is totally inadequate as a forest plan, and NFMA's reform measures have yet to improve Tongass management. Because of Section 705 of ANILCA, the TTSF, the 50-year contracts, and an ineffective and incomplete TLMP, Tongass management is heavily biased in favor of large-scale clearcut logging, to the detriment of wildlife, fishermen, small loggers, tourism industries, and subsistence users of the forest's resources. These are the roots of the tangled, growing thicket of Tongass timber problems.

*Part II*

*Important Renewable Tongass  
Resources Under Siege*

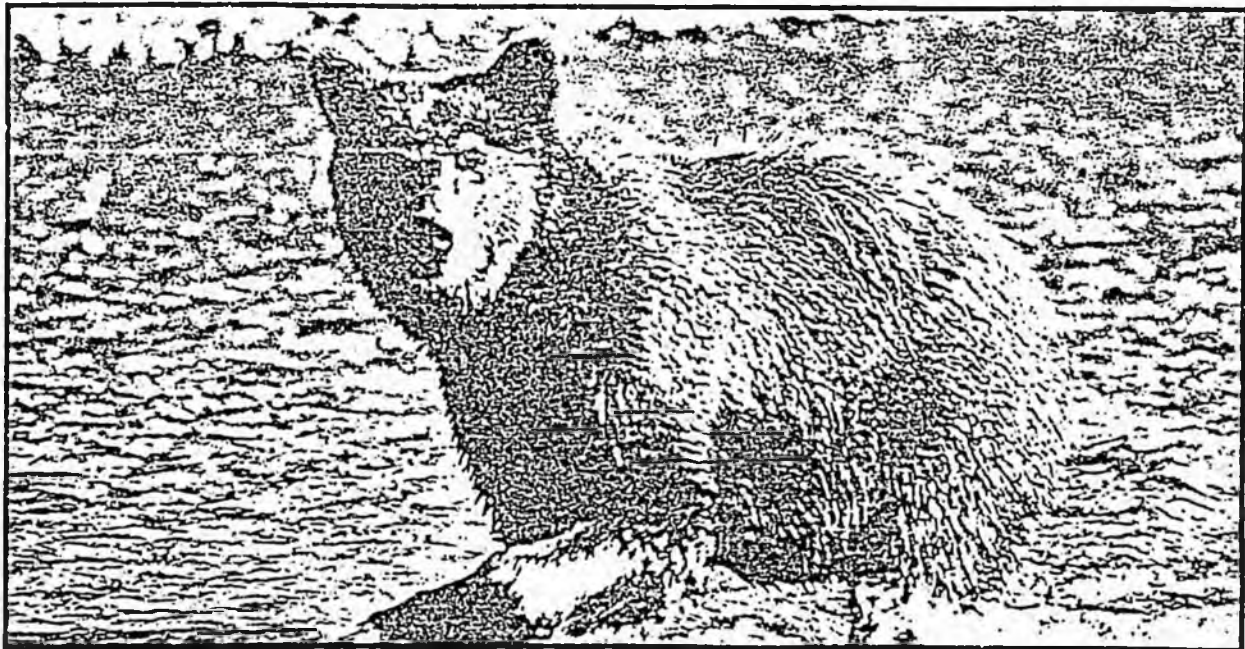


## II. IMPORTANT RENEWABLE TONGASS RESOURCES UNDER SIEGE

Though the Tongass is a huge forest rich in fish, wildlife, wilderness, timber, and other resources, it is also a unique, complex, and fragile ecosystem. The extensive, large-scale logging programs implemented by the Forest Service on the Tongass are decimating vast areas of this grand old-growth rain forest. Critical fish and wildlife habitat areas that have already been lost include Blind Slough, Kadake Creek, Rodman Creek, Staney Creek, Thorne River, and Sweetwater Lake, to mention only a few.

### A. WILDLIFE HABITAT AND POPULATIONS THREATENED

#### 1. Brown (Grizzly) Bear



*(Photo by Joel Bennett)*

Alaska has the last major population of brown (grizzly) bear left in the entire United States, with the greatest concentration of bears occurring in Southeast. While these magnificent animals once ranged all over North America, they have now been beaten back from their original range to isolated pockets in Alaska, Canada, and a few national parks in the lower 48 states.

Tongass brown bears, larger than the brown bears found in Canada, are well distributed on Admiralty, Chichagof, and Baranof Islands, as well as the coastal mainland of Southeast Alaska. Although Theodore Roosevelt proposed a national bear reserve for Admiralty, Chichagof, and Baranof Islands, the places have been largely left in control of the Forest Service. Today, with the exception of Admiralty National Monument, clearcut logging threatens these bears through habitat destruction. Road building is the major problem causing increased human/bear conflicts and illegal hunting. These activities will continue to reduce or destroy bear populations as long as the Forest Service proceeds to penetrate unroaded, wild country with new logging.

2. Sitka Black-tailed Deer

The same high-volume, old-growth timber stands that attract the two major Tongass logging companies, APC and LPK, are also essential to the survival of the Sitka black-tailed deer. This is the only deer found in the Tongass, and while good populations exist today, they can fluctuate wildly depending on the severity of winter weather. The thick stands of old-growth timber shelter the deer during deep snows, allowing them to continue browsing under the canopy of giant spruce and hemlocks. Without this protective old-growth timber, deep winter snows lead to starvation and drastic deer population losses.

Further, second-growth timber is worthless as deer habitat. The Forest Service itself has stated that once an area has been clearcut, it will not produce significant deer forage, except for the first few years after cutting. In winter, however, when habitat and forage availability are critical, these clearcuts fill up with snow and are impassable and browse is buried. In 15-20 years, an extremely dense stand of small trees grows up to block light from reaching the forest floor and results in virtually no browse growing under these tight thickets for the next hundred years.

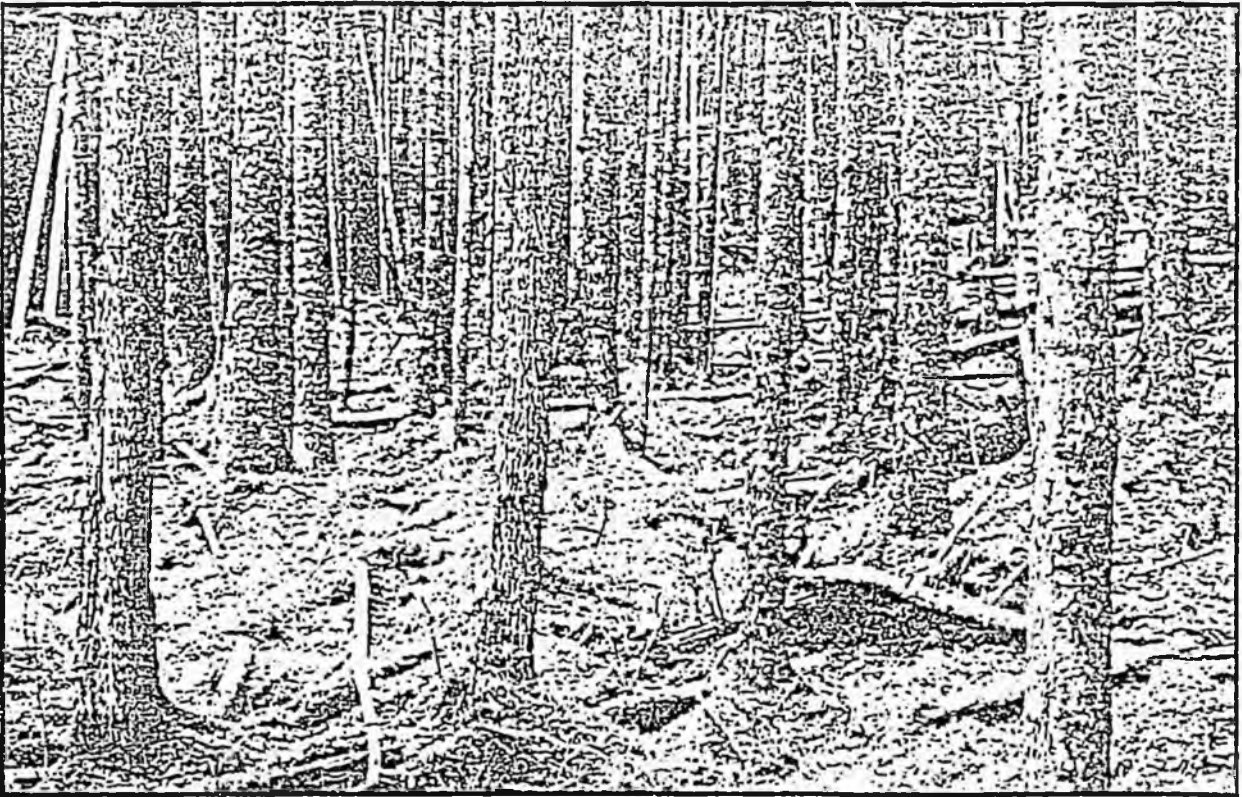
Since present Forest Service management calls for these forests to be harvested at 100 year rotations, the result is permanent loss of deer habitat. Second-growth forests will account for 75-80% of the managed forest land in the Tongass at the end of the first 100 year rotation. By then half of the now important available deer winter habitat will be lost forever, and deer populations will be severely reduced and even eliminated from certain places. Subsistence users and sport hunters will lose their most important game animal on the Tongass. Table 1 details some key areas where deer populations and subsistence and sport deer hunting will suffer the greatest losses.



Sitka black-tailed deer.  
(Photo by Scott Foster)

Name	% Commercial Forest Land Harvested	% Deer Loss After 100 Years
Hawk Inlet	78%	88%
Eagle Peak (Youngs Lake)	60%	77%
Tenakee Springs	67%	83%
Kadashan	64%	77%
Lisianski River	63%	66%
Uhsk Bay	60%	64%
Kelp Bay	75%	86%
Kadake Creek	68%	74%
Castle River	65%	72%
Woewodski	66%	70%
Point Baker (Alder)	79%	92%
Myers Chuck (Cannery Creek)	65%	88%

Table 1. Old growth harvest equals critical deer habitat loss.



Above: 150 year old stand of *SECOND GROWTH*. Note density of trees and lack of browse.

Below: *OLD GROWTH FORESTS* provide shelter from deep winter snows and plenty of browse for food.



## Resources Under Siege

### 3. Other Wildlife

Many other mammals and birds are also dependent on old-growth timber or unroaded wild country. Clearcut logging will harm their populations by destroying essential habitat areas, by increased conflict with humans, and by increased hunting pressure for some species.

Moose, for example, while dependent on early successional stages of browse (like that found in river courses or clearcuts), also depend on old-growth timber for shelter and winter cover. Road access increases hunting pressure, often beyond sustainable levels. Forest Service activities in Berners Bay, Thomas Bay, and the Yakutat Forelands threaten moose populations.

Mountain goats are extremely sensitive to human disturbance and also depend to an extent on old-growth forests for winter habitat. Populations are expected to suffer as road access or clearcutting approach their limited home ranges.

Finally, many small mammals integral to the forest ecosystem depend solely on old-growth forest for habitat. These include marten, mink, and land otters. Research has conclusively shown how clearcut logging and roading displaces or destroys populations of these small furbearers.

In Southeast Alaska bald eagles are found in denser concentrations and higher numbers than in all the rest of North America. It is well documented that these raptors need old-growth Sitka spruce trees along beaches for nesting habitat. Existing eagle nest trees are not normally clearcut, but exceptions are sometimes made. The 1986-1990 APC operating plan proposes to cut or impact 37 of these important trees. This type of incremental destruction, combined with serious high-grading of high volume timber stands could pose a problem for eagle populations. In addition, ravens, owls, Canada geese, great blue herons, and many song bird species are also threatened since they nest primarily in old-growth timber.



*BLUE GROUSE* occur in high densities in old-growth forests throughout much of Southeast Alaska.



*BALD EAGLES* depend on old growth trees for nesting habitat.

## B. FISH HABITAT AND POPULATIONS THREATENED

Southeast Alaska is blessed with an abundance of anadromous fish resources, including salmon, char, and trout. These anadromous fish, so called because they live in the ocean, but spawn in freshwater rivers, lakes, and streams, depend on clean, cool, highly oxygenated fresh water for reproduction. Logging and roading threaten these vital habitat needs.

Alaska's king, coho, pink, sockeye, and chum salmon make up the backbone of America's largest commercial fishing industry. These commercial species plus steelhead, cutthroat, and dolly varden char also constitute a huge subsistence and sport fishery.

Although research is still underway, many of the impacts of logging on fish habitat are well understood. Clearcut logging right up to the banks of salmon streams reduces the temperature buffering effect of streamside vegetation. This results in excessively high or low water temperatures which can be lethal to fish. Despite this well documented impact, Tongass planners still refuse to require buffer or leave strips on such streams, thus ignoring a basic requirement of NFMA and of common sense. Siltation from landslides or erosion associated with logging or logging roads can clog salmon streams and smother salmon eggs.

Tongass logging operations can result not only in the cost of subsidies, but also in the cost of lost fishery resources. The cost of these losses can be measured in both millions of dollars lost as well as the loss of a way of life by subsistence and commercial fishery users.

For example, the Chuck River on the mainland north of Petersburg supports a salmon fishing industry worth \$1 million per year to commercial fishermen. But the Forest Service has targeted the Chuck River drainage for logging and roading. The Chuck River area is known for its unstable soils, and timber operations could well trigger a major landslide, destroying this valuable fishery. The Forest Service estimates its cost for preparing the Chuck River sale and road access at \$7-10 million and this does not even include the dollars that would be lost from the fishery. Total receipts expected by the Forest Service from the Chuck River sale amount to less than \$50,000 -- a pittance of the present value of the Chuck River.

Cutting to the edge of streams disrupts the natural balance of root wads, snags, and other woody debris essential to maintaining cover and habitat for juvenile salmonids. Clearcut areas on Prince of Wales Island have been sampled since timber operations were completed decades ago. These sampled areas show a lack of fish habitat and a resultant lack of fish due to the absence of small stream debris. Clearcutting to stream edges can also disrupt salmon migration and spawning when logs falling into streams create log jams, damage salmon spawning beds, or cause siltation which smothers eggs.

In June 1985, at a Congressional hearing dealing with below-cost timber sales the American Fisheries Society, a professional society of fishery biologists, addressed the problems of timber harvest and fishery damage. Two major points that stood out were:

## Resources Under Siege

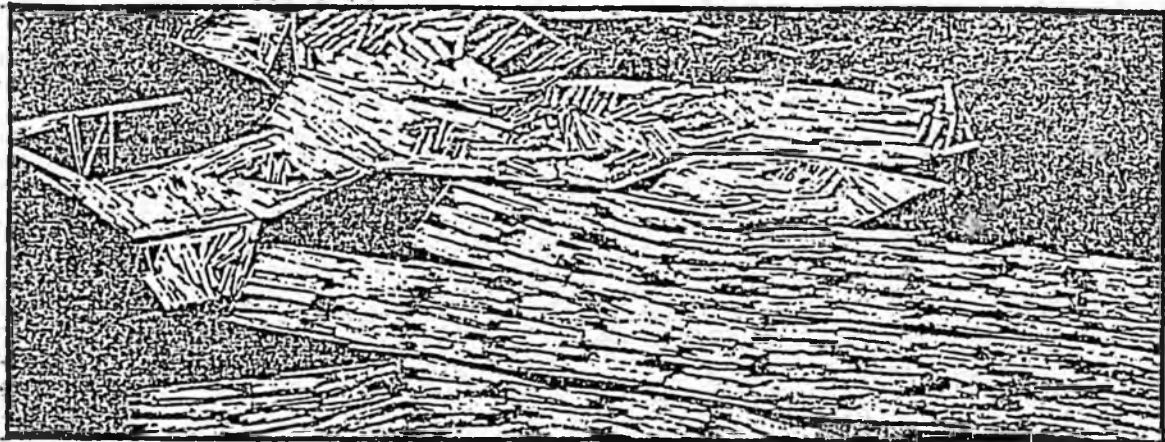
1. Virtually every timber sale and subsequent harvest has adverse impact on fisheries resources.
2. The value of the public land fisheries resources impacted by timber sales is very great and indeed can be far greater than the value of the timber.

Unfortunately, plans that will damage important fish habitat areas in the Tongass are widespread. In addition to the Chuck River, other threatened systems include the Naha, Karta, Thorne, Castle, and Lisianski Rivers; the Outside Islands; and the many rivers within the Yakutat Forelands.

The State of Alaska has recognized the value of streams and has opted for 300 foot buffers on streams on the Haines State Forest. The Forest Service's own cooperative research shows that clearcuts with buffers may be adequate and/or beneficial to salmon production. Yet, the agency refuses to adopt a standard buffer policy or even implement its own Area Guide faithfully. The Forest Service is out of step with its own research and 300' buffers should be the rule.

Naturally functioning river systems, undisturbed by roads or logging, remain the most reliable producers of salmon and other fish. Unimpaired streams, lakes, and estuaries must be left this way if the full potential of Alaska's rebuilding fisheries is ever to be reached and maintained. For such fish as the pink and coho salmon, a myriad of small streams cumulatively produce the bulk of the fishery. Each and every one of these small streams is important, with coho rearing streams being especially vulnerable. Further, every king and sockeye system is also at a premium, since these systems are relatively less common in southeast Alaska. Logging threatens these systems, large and small.

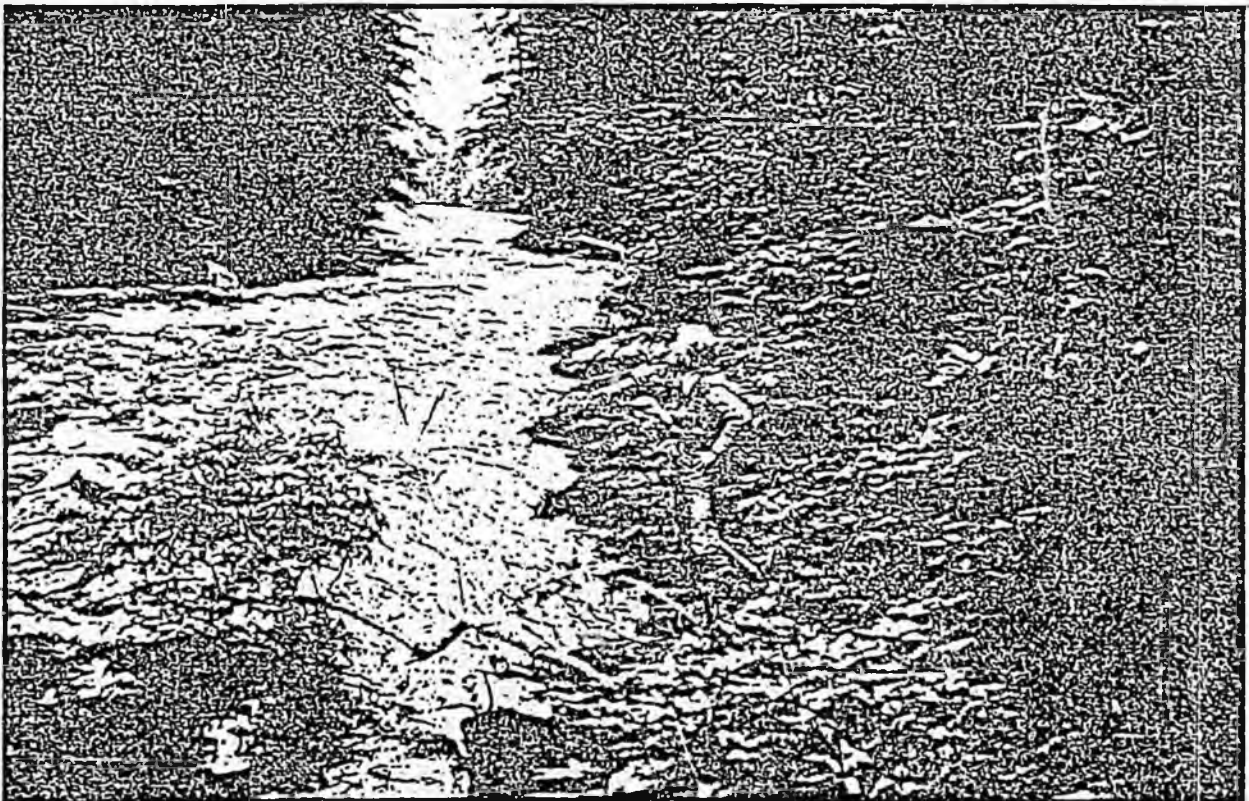
Log dumps and storage facilities have an adverse impact on the ocean or estuarine ecosystems they utilize. Crab, shellfish, herring, and other important fish resources are poisoned by toxic acids leached from accumulations of old barks, smothered by logging debris, or barred from spawning habitat by rock fill for log landings. The Environmental Protection Agency is currently studying this resource damage in an effort to formulate permits to help mitigate the impact of log dumps.



*LOG STORAGE FACILITIES can adversely impact marine life such as crabs and shellfish utilizing the same area.*

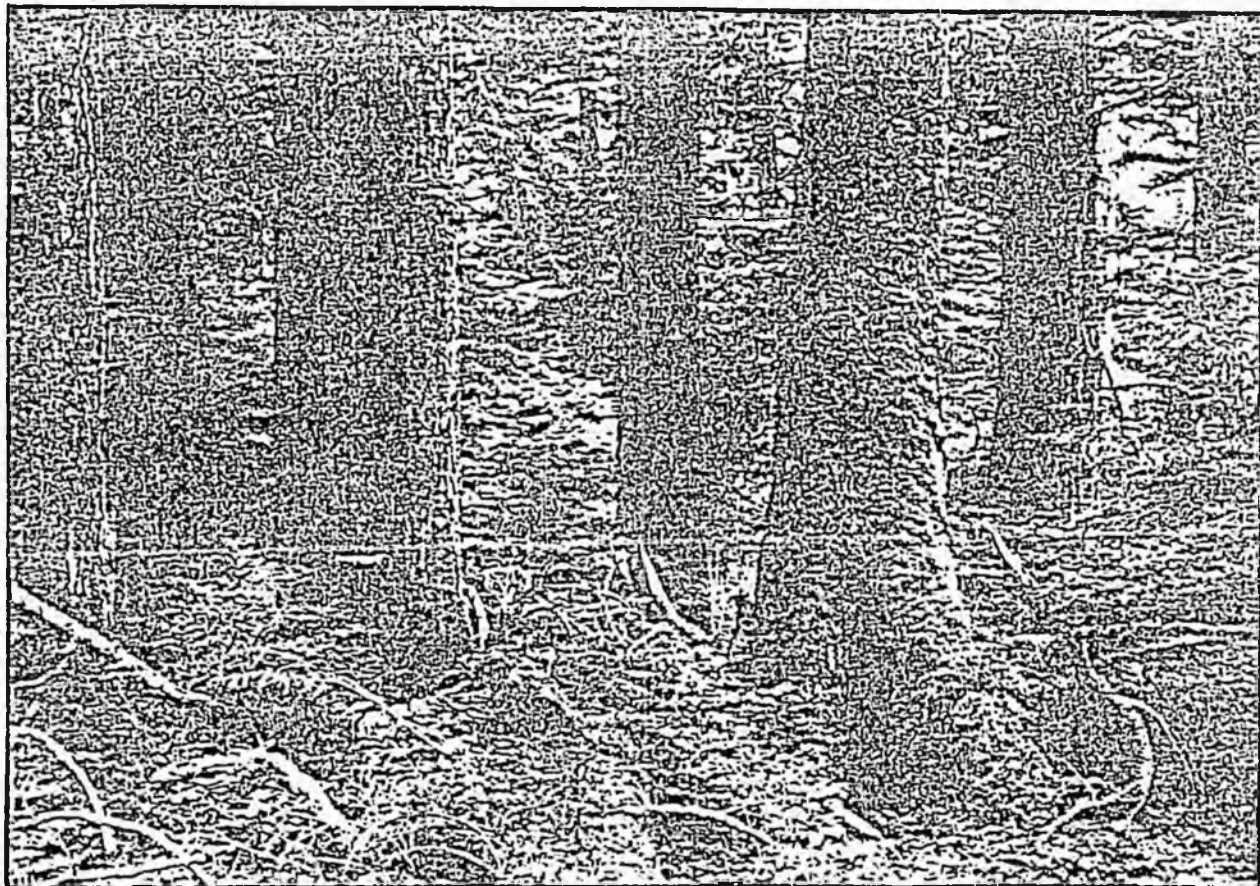


*STREAM BUFFERS* of at least 300 feet protect fish from lethal temperature extremes, siltation which smothers eggs, and debris which prevents salmon migration upstream.



C. OLD GROWTH AND WILDLANDS

1. Not Enough Old Growth Protected



Opponents to conservation in southeast Alaska, primarily the Forest Service and timber industry, often claim that over one-third of the Tongass National Forest was "locked up" in ANILCA, leaving the impression that vast commercial timber resources were lost forever from development. The facts do not bear this out. The Forest Service has stated that: 1) Wilderness and roadless area management designations provide direct benefit to wildlife, and 2) that Wilderness and roadless area designations will maintain a variety of natural habitat conditions for wildlife and fisheries over approximately 48% (8.2 million acres) of the Tongass. The first statement is accurate, but the second statement is misleading.

There is approximately 5.7 million acres of commercial forest land in the Tongass, and of that, only 1.6 million acres (28%) is in designated Wilderness. Of the 28% of Wilderness acreage that is considered capable commercial forest land, one-half is not considered suitable for timber harvest. Less than 10,000 acres of this Wilderness is prime value, high-volume old-growth timber which is also important wildlife habitat. Only 160,000 acres is over 30,000 board feet per acre and considered commercially valuable. These acres are also critical habitat. Fully three-quarters of the 5.4 million acres of officially designated Tongass Wilderness is non-forest land -- mostly rocky peaks, ice fields, muskeg, and battered coastline.

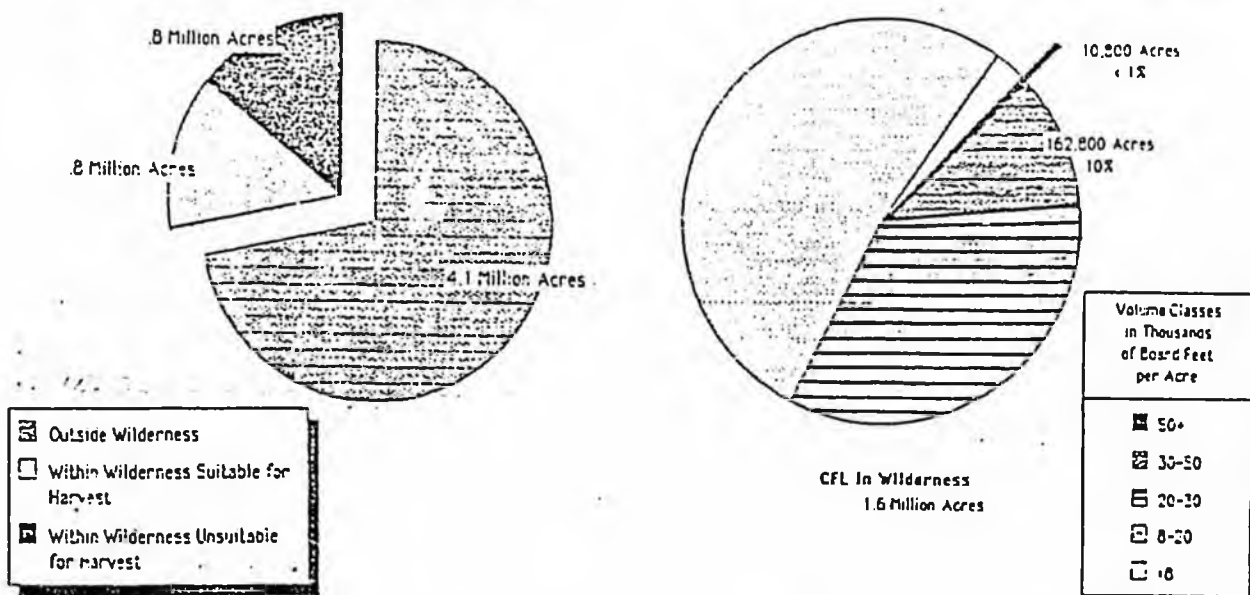


Figure F. Of the 5.7 million acres of Commercial Forest Land (CFL) on the Tongass National Forest, only 1.6 million acres are in Wilderness. CFL must contain at least 30,000 board feet/acre to be commercially important.

Clearly, most all the Wilderness designated in Southeast Alaska (with the exception of Admiralty Island and a few small watersheds) was land that developers did not want. It had little value in forest resources and is largely inaccessible. Even so, Admiralty Island is repeatedly cited as the example of locking up good timber. The best timber areas on Admiralty Island were cut prior to ANILCA and the island was not in either 50-year contract area for the two big mills, so its designation did not affect either mill. In fact, the Wilderness selections left the 2 mills virtually unscathed. In the few instances when they were affected, the acreage was later replaced via contract area acreage replacements and also with subsidies in the form of the TTSF.

The Forest Service, timber industry, and some others like to call the Tongass Timber Supply Fund a "wilderness subsidy." SEACC views the TTSF as a major federal payment to underwrite timber harvest activities on the Tongass, not as a subsidy to support the wilderness system. The 1985 TTSF allocation is for \$53 million. There are nine line items for the fund that include timber sales preparation, timber stand improvement, road construction, engineering support, etc. There is no item listed as "payment for wilderness."

The lack of protection for old-growth forests was a major oversight in ANILCA. The Society of American Foresters stated that "the best way to manage for old growth is to conserve an adequate supply of present stands and leave them alone." The Alaska Chapter of the Wildlife Society stated that "old-growth forests are a rare and rapidly diminishing resource...The coastal forests of Alaska represent the last major expanse of old growth remaining in the U.S.... adequate old-growth habitat must be maintained for the present and future...." It is estimated that perhaps 100,000 acres of highest-volume old-growth stands remain in the Tongass, but these stands are being harvested at the highest rate of any volume class on the forest. They will not last long.

## Resources Under Siege

Old-growth timber, in high-volume stands, is best protected as wilderness. In this way, such stands are shielded from the pressure of high-grade logging and can continue to produce fish, wildlife, and other renewable resources. Rock and ice cannot serve this function. John Matthews, of the Alaska Department of Fish and Game, summed up the problem with Tongass wilderness areas saying, "If you can't grow timber there, you can't grow wildlife there either."

As described before, Tongass planners continue to road and log every available unprotected roadless drainage at a rate far beyond demand, far beyond economic justification, even far beyond TLMP's original goals. The 20,000 acres of timber offered annually, 300 miles of road built per year, and construction of interlocking segments of an overall transportation network threaten those few remaining roadless Tongass drainages -- most of which continue to provide all wilderness related values despite their lack of formal protection. As one Tongass Forest official freely admitted, "As far as we're concerned, if an area doesn't have a road in it or a [wilderness boundary] drawn around it, it's up for grabs" until TLMP is revised in 1989. Since 1979, 25% of the roadless lands in LUD IIIs and 30% in LUD IVs have been developed. If this rate continues, all the unprotected roadless land will be developed in just 20 years (by 1999). It would be far wiser, and certainly more cost-effective, to halt this onslaught now and preserve the option of adding more wilderness to the Tongass if it is needed in the future.

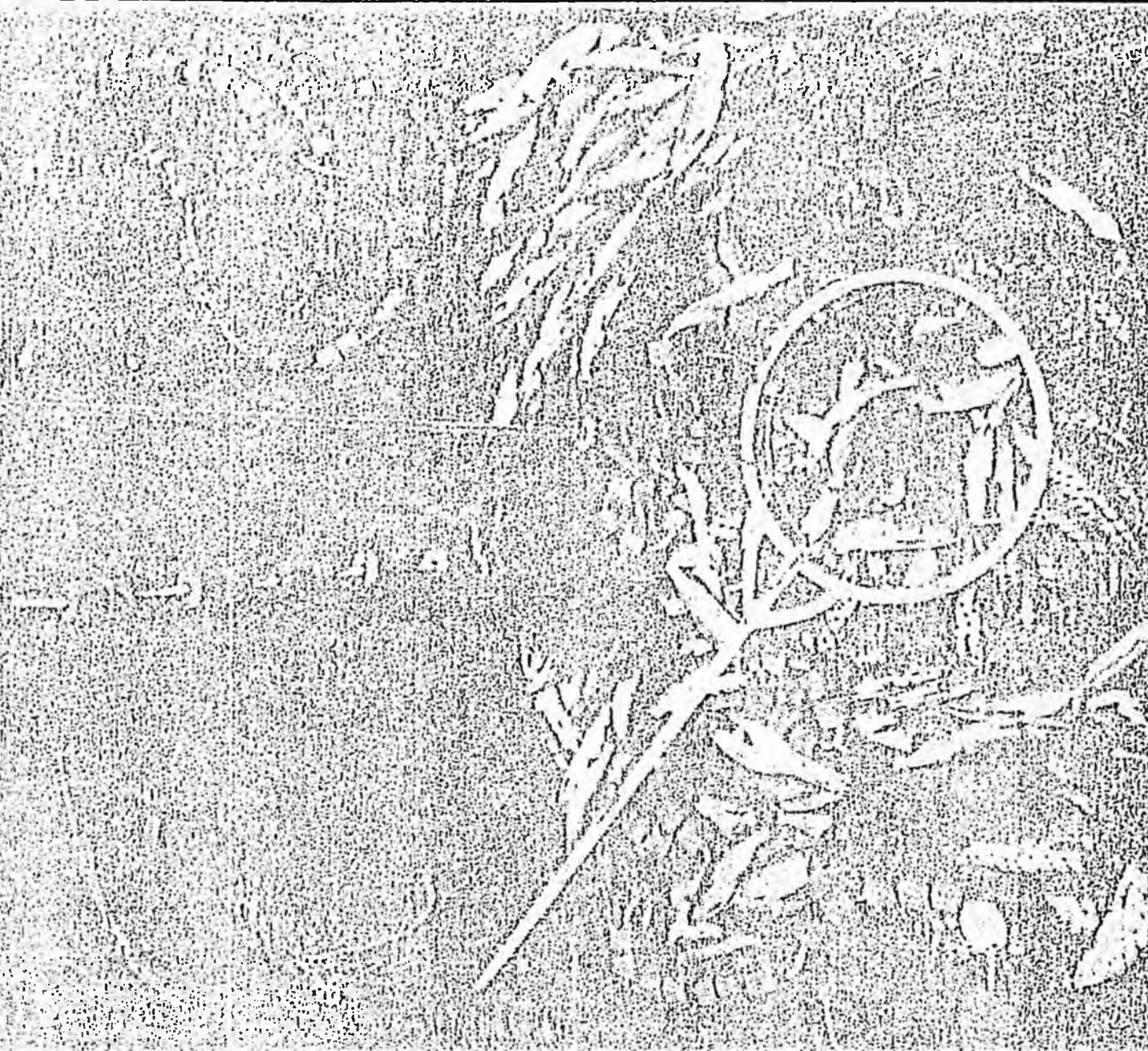
### 2. Protecting Old Growth and Wildlands Makes Economic Sense

Beyond its value as vitally important fish and wildlife habitat, Tongass Wilderness is also an invaluable asset in other ways to Southeast Alaska and the nation. It is ideal habitat for a variety of thriving populations of fish and game species. It makes possible the subsistence uses of these areas, and allows sport hunting and fishing. Wilderness with its undisturbed watersheds provides the critical spawning and rearing areas for fisheries which maintain the commercial fishing industry year after year. Wilderness provides the resources that support a growing tourism and recreation industry. It preserves clean air and clean water. When you leave the land as it is, in a natural state, the benefits are numerous and perpetual. Management of national forest lands in Wilderness is also extremely cost effective, particularly in Alaska. It should be noted that Alaska Wilderness Areas are managed as directed by the 1964 Wilderness Act, as amended by ANILCA, which specifically authorizes certain activities. This includes provisions for subsistence use; for public recreation cabins; for certain fish habitat enhancement activities; and for use of airplanes, motorboats, and snow machines.

In development of Alaska's Chugach National Forest Land Management Plan in 1984, Chugach planners discovered that by following NFMA procedures and using Forest Service value comparison figures, their computer programs showed the highest value for the Chugach Forest would be produced by managing every presently roadless area as wilderness. This was no mistake, for Alaska forest lands have negative values for timber production and other intensive developments. In contrast, wilderness management enhances the highest revenue producing aspects of Alaska's forest resources -- fish, wildlife, recreation, and tourism. Of course, Chugach planners rejected their own figures on the basis of pre-conceived notions about the proper role of timber management in Alaska's forests. Not suprisingly, Tongass planners have steadfastly refused to perform similar NFMA required economic analyses.

**Part III**

**Tongass Management  
Threatens Southeast  
Alaska Economy**



Previous page: 80-85% of the salmon harvested in Southeast Alaska are SPAWNED AND REARED IN TONGASS NATIONAL FOREST WATERSHEDS. The future of Southeast's commercial and subsistence fishing is directly dependent on the wise management of Tongass forest resources.

### III. TONGASS MANAGEMENT THREATENS SOUTHEAST ALASKA ECONOMY

#### A. SEARCH FOR LONG-TERM ECONOMIC STABILITY

The economy of Southeast Alaska, like any frontier area, has always suffered from spectacular booms and busts, wild fluctuations in economic activity. Each boom has been a result of discovery and short exploitation of valuable resources with a concurrent lack of incentive for slower, long-term development. First came Russian fur traders, who overharvested this resource and sent the profits back to Russia. Next came gold miners, who made and lost fortunes over periods as short as a few months, then returned to where they had travelled from. Fish canneries from Oregon and Washington over-exploited and nearly destroyed Alaska's salmon stocks in the 1950s.

Alaska's first territorial governor, Alfred P. Swineford, warned in 1888 that if resource exploitation was allowed "Alaska would be...nothing more than a national fat goose left unprotected and to be annually plucked of its valuable plumage by non-resident corporations." Nearly one hundred years later, Swineford's words still ring hauntingly true. Today it is the large-scale logging companies' turn to cut and run, plucking the wealth from Alaska's Tongass National Forest.

This exploitation is especially sad, since this latest round of exploitation and short-term planning endangers other healthy, stable, and growing sectors of the Southeast Alaska economy which have become new economic mainstays. When you exploit a resource, you exploit the people, as well.

Most Southeast Alaska towns and villages are directly dependent upon the Tongass National Forest for community stability. Maintaining this stability is extremely important. Rather than being dependent upon the commercial timber resource, many of these communities are instead directly dependent upon the renewable fish and wildlife and other subsistence resources for the maintenance of community stability. The long-term stability for these many communities is thus undermined by the exploitation of the Tongass' timber resources.

Southeast's sustainable industries must survive and grow if Alaska's economy is ever going to break the boom and bust cycle and move into a post-frontier economic realm. These threatened industries include commercial fishing, hunting and guiding, tourism, wilderness outfitting, and subsistence. While not technically an industry, subsistence use of fish and wildlife resources is a primary economic element in the lives of many Southeast Alaskans and supports people outside of the cash-based economy. In addition, Native timber harvest is being stifled by current Tongass management policies.

B. TIMBER MINING THE TONGASS

1. Timber Mining: A Short Term Industry

The Tongass timber resource is being managed as a non-renewable resource. This is timber mining -- the permanent removal of old-growth trees. Only 4% of the Tongass (635,000 acres) contains high-volume, commercially valuable timber. All of this is old growth. The present Tongass timber program of cutting the highest value timber stands first (high-grading), threatens these commercial timber lands with virtual exhaustion in just a few decades. The present rate of clearcutting is 200,000 acres per decade. At this harvest rate, and with the continuance of high-grading, all that will remain will be low-volume, scattered timber stands known in logger's parlance as "junk." The situation is very critical for highest grade spruce and cedar logs.

When the high-volume, economically valuable timber is gone and only the junk timber is left, no timber harvest will be worthwhile. Even now, with mostly valuable high-volume timber being sold, timber operators continually lose money. Since ANILCA, APC has claimed over \$150 million in losses despite the massive federal subsidies it has received as a result of the Act. The Forest Service has already slashed virtually all timber purchaser costs it can legally eliminate, but nothing helps. Even the Chief of the Forest Service pointed out last year that the Forest Service could cut Tongass timber itself, haul the timber out of the woods, barge it to the timber mills for free, and the companies would still lose money. Clearly, something basic is wrong with such a market.

A large part of the problem is that world markets for pulp are slowly shrinking and new mills are able to out-compete Alaska's mills. Long-term economic prospects for Alaskan timber markets are bad. The Forest Service predicts that "unless a major new market can be found for Southeast Alaska's pulp and/or its pulp grade logs, a long-term decline in Alaska's timber industry is anticipated, even with a short-term improvement in its pulp markets."

Another part of the economic problem is a timber management program inappropriate for Southeast Alaska. Small-scale logging occurred on the Tongass for many years before the introduction of the large pulp mills. These small-scale loggers cut selectively, taking only a few large, old-growth spruce trees at a time, basically leaving the lower value hemlock trees in place. There were some scattered small clearcuts around the forest during the 1920's and 1940's.

With the advent of the large pulp mills and large-scale logging, however, extensive clearcutting became the standard Tongass timber harvest technique. Although it is the cheapest way to take large amounts of logs from the woods, clearcutting harvests both the low-value and high-value species of trees. Tongass hemlock, being worth far less than logging costs, lowers the overall value of the clearcut, resulting in increased pressures to harvest the most valuable timber stands now and not later. This is why the Tongass is currently being high-graded.

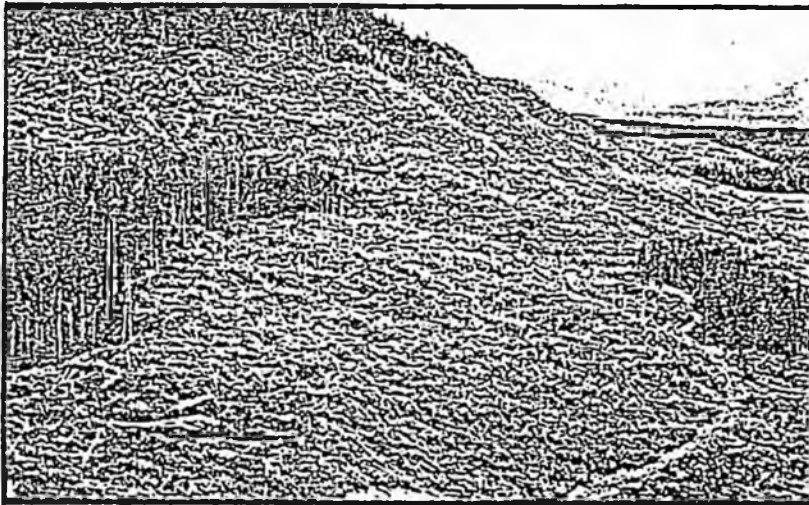
## 2. Second Growth: An Economic Fallacy

In Alaska, with high harvest costs and slow growing timber, only large, very old trees are worth cutting at all. Within the next hundred years over two million acres of the Tongass will be clearcut, and the smaller, shorter, "second growth" timber growing in these clearcuts will not be commercially valuable. The practice of 100-year timber "rotations" needs a closer look in Alaska since there is no foreseeable market for the next generation of 90-110 year old trees.

While nobody can say for sure, the future of Alaska logging looks grim if present clearcutting and high-grading continues. The Alaska Department of Revenue studied this problem and stated that:

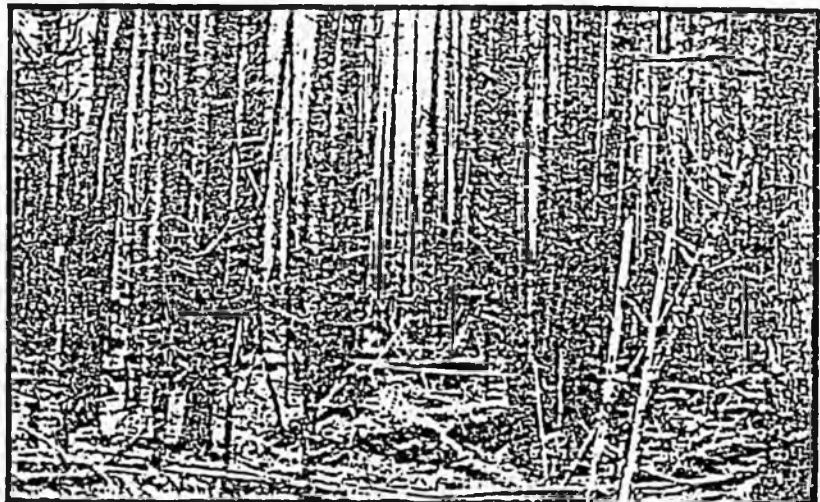
*The logging of old growth is a mining operation. Timber in Alaska means coastal old growth. And old growth is not a renewable resource. There is no reasonable possibility of a second growth industry in Alaska.*

Time is quickly running out for creation of any reasonable, stable, sustained yield timber industry in Southeast Alaska. The Forest Service is doing nothing to solve this problem, or hasten the creation of such an industry.

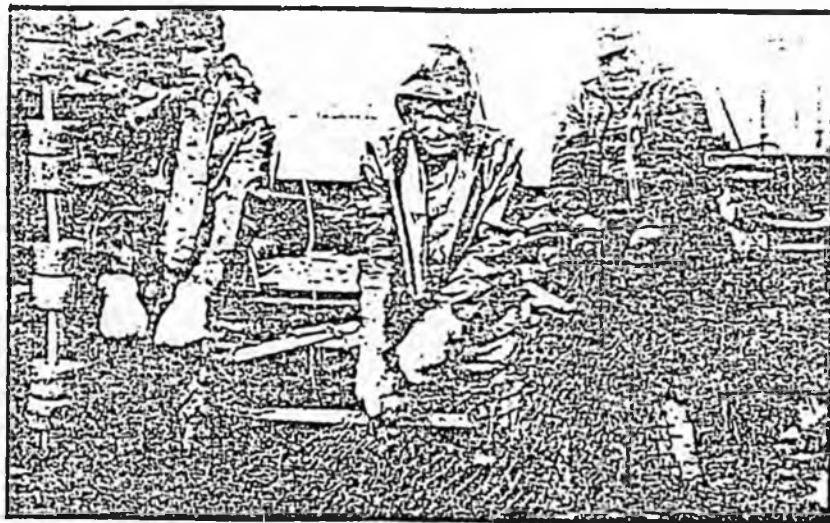


*Left: FOREST SERVICE POLICY -- take the best first, when that's gone log the best of the rest.*

*Right: 75 YEAR OLD SECOND GROWTH. The Forest Service claims these small trees will be commercially valuable in 25 more years.*

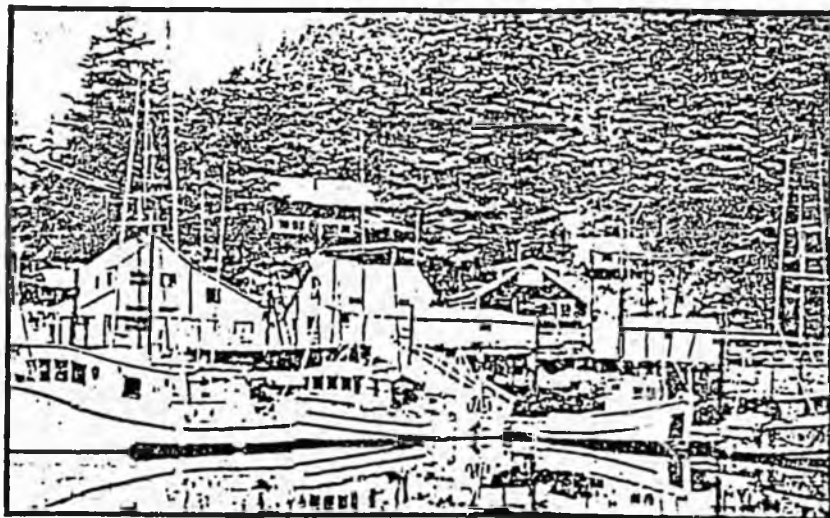
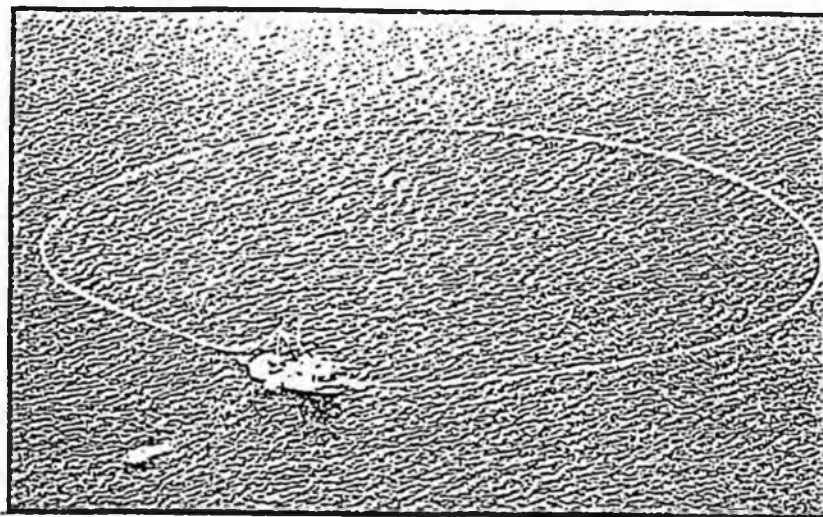


## Southwest Economy Threatened



Left: Hauling in nets. A \$160 million per year industry, COMMERCIAL FISHING PROVIDES JOBS for thousands of Alaskans.

Right: Purse Seining. COMMERCIAL FISHING has proven to be a truly RENEWABLE and SUSTAINABLE INDUSTRY.



Left: FISHING is the ECONOMIC MAINSTAY for the residents of the community of Elfin Cove. (Photo by Margaret Piggot)

### C. COMMERCIAL FISHING INDUSTRY THREATENED

Alaska's commercial fishing industry is on a strong rebound from the 1950's. The incredible wealth of the Alaskan salmon fisheries is not that well-known. A commonly overlooked fact is that the riches derived from Southeast's gold mines, riches that have become part of Alaska's folklore, were dwarfed by the value of salmon catches during that same period -- catches which brought ten times more revenue than gold.

Salmon catches peaked around 1940, with the all-time high catch for any single year of 67.8 million fish in 1941. Catches then began falling steadily to a low of just 7 million fish in 1967. Like so many assumptions on which TLMP was based, the Forest Service wrongly believed in 1979 that salmon stocks would not recover to previous levels. Through diligent fish management and careful control of harvest, the Alaska Department of Fish and Game has quickly proven this assumption to be wrong. In 1983, 40.4 million salmon were caught in Southeast Alaska. In 1985, 44 million pink salmon alone were caught, the fourth best pink salmon year on record and best year since 1949. Experts now agree that a sustainable average annual catch of 46.0 million salmon can serve as a reasonable goal for the rest of this century.

In terms of jobs, this fish harvest directly employed an average of 3,225 people a year between 1979-1983. This is more jobs than provided by the timber industry. Recent fishing employment figures are also undoubtedly higher. Since passage of ANILCA, commercial fishing has proven itself to be an industry that is renewable and sustainable not only in theory, but in practice. The commercial fishing industry in Southeast Alaska is now a \$160 million per year industry, with very little investment by the federal government.


The timber industry likes to claim that logging has had no negative effect on fisheries since record catches have occurred during recent periods of heavy logging activity. This claim is very misleading. The fact is that the recent upswings in salmon production are the result of years of improved and more precise management practices of fish stocks and the regulation of the fishing fleet by the State of Alaska. Warm winters for the last several years and reductions in high seas interceptions also contributed greatly to increasing salmon production. The State's improved management strategies, initiated at a time of low salmon population, have been effective enough to counteract the negative effects of logging that cause loss of production as a result of stream habitat degradation. Salmon catches would be even higher if key fisheries on Prince of Wales Island; off Peril Strait, and in other areas had not been damaged by logging.

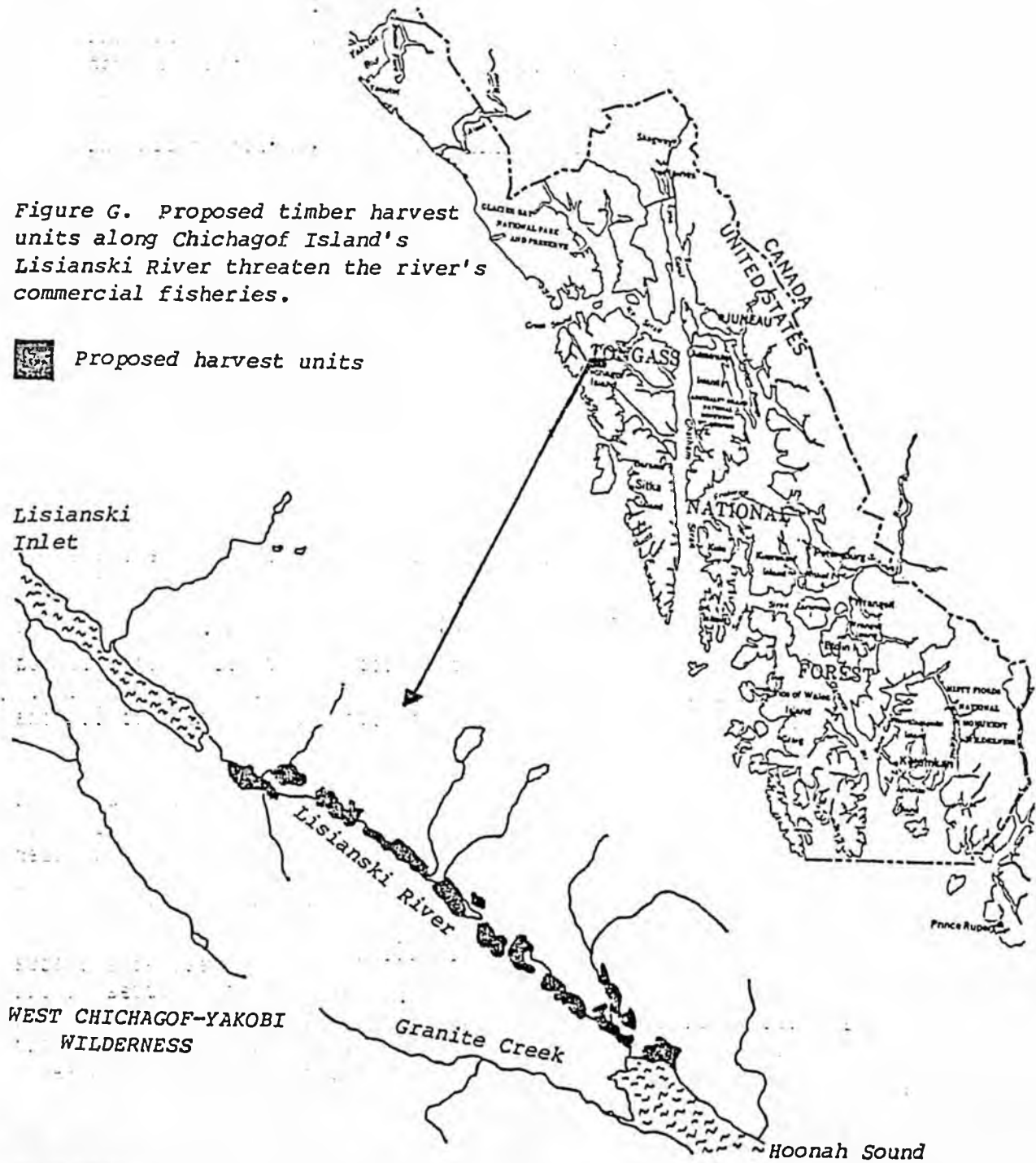
As explained, logging threatens fish habitat, which in turn threatens the commercial fishing industry. The Forest Service itself states that 80-85% of the salmon harvested in Southeast Alaska are spawned and reared in watersheds within the Tongass National Forest. There is no way that the agency's promise of full protection of the biological potential of fisheries habitats in the non-wilderness areas can be fulfilled where clearcut logging occurs. The two are mutually exclusive. The most recent example is the Lisianski River, one of the top five salmon producers in Southeast Alaska. The Forest Service plans to allow APC to devastate this fishery with clearcuts and roads right along the river's banks.

Southeast Economy Threatened

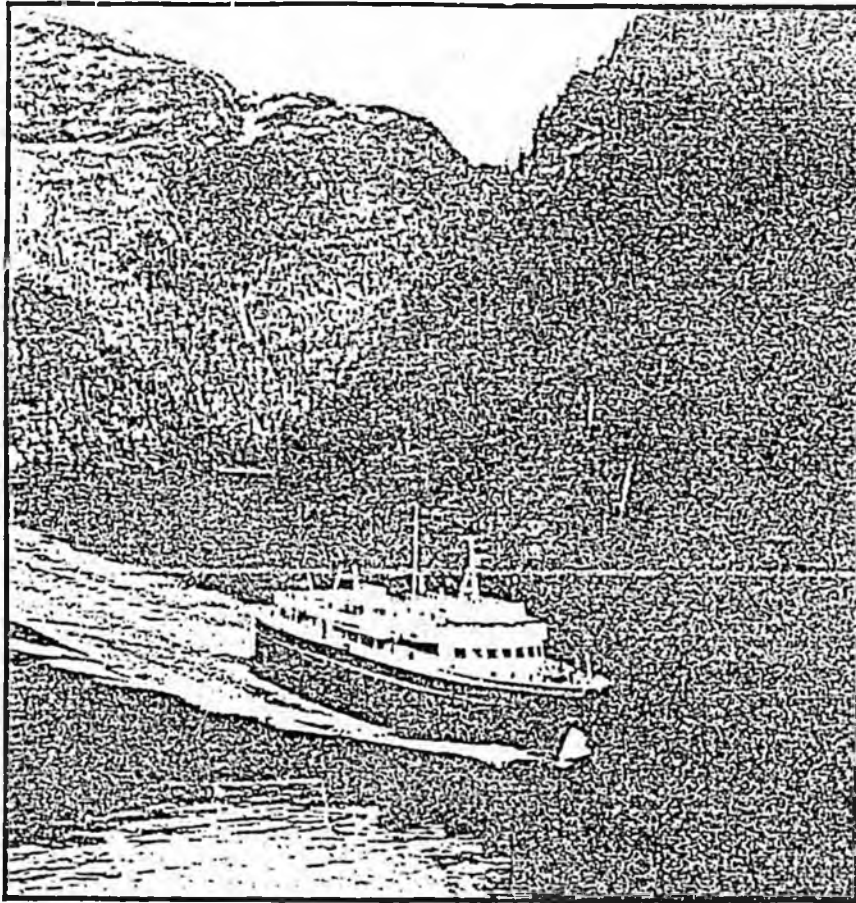
Current logging plans target important fisheries like the Chuck, Lisianski, and Kadashan Rivers; the river systems of the Yakutat Forelands; and others. Many fishermen see the demise of their livelihood at the hands of the Forest Service's nonrenewable and destructive timber program. Timber in a particular area is harvested just once. The value of the fish produced by a particular drainage, probably in all cases, vastly exceeds the value of the timber, especially when considered over a 100 year rotation. We cannot risk the loss of Southeast's valuable fisheries for a questionable short-term timber harvest gain. Given the success story commercial fishing presents in the Southeast Alaska economy, such a loss would be tragic.

Figure G. Proposed timber harvest units along Chichagof Island's Lisianski River threaten the river's commercial fisheries.

 Proposed harvest units



D. TOURISM INDUSTRY THREATENED



(Photo by AK Division of Tourism)

According to economic planners, tourism is the only primary industry in Alaska expected to show major growth in the 1980's. As with commercial fishing, general recognition of the importance of tourism has increased markedly since passage of ANILCA. In 1984, Alaska Governor Bill Sheffield declared that "Alaska's natural beauty is one of our great treasures and tourism is Alaska's most renewable resource." TLMP virtually ignored this aspect of the Southeast Alaska economy.

Since 1959, tourism has averaged an annual growth rate of between 7-10%. This incredible growth rate has carried tourism right to the forefront of Alaska's industries. Southeast Alaska is the beneficiary of much of this tourism. From 1975 to 1983, there was a 47% increase in cruise ships visiting Southeast Alaska and a 61% increase in the visitor capacity of those ships. The number of sightseeing flights over Misty Fjords National Monument was practically insignificant before 1979, but 7000 of these flights were made in 1984.

Employment created by the 185,000 tourists visiting Southeast Alaska in 1983 exceeded 2,600 full-time jobs. Again, this is more jobs than provided by the timber industry. The figures for tourism employment grow significantly each year.

## Southeast Economy Threatened

The Forest Service itself has recognized that recreational use of the Tongass increased by 85% between 1980 and 1985, and that "opportunities of the kind Southeast Alaska offers are not available anywhere else in the United States." But the agency is doing little or nothing to protect the unique wilderness landscapes of the Tongass which attract tourists and provide such outstanding recreational opportunities. Tongass logging poses the biggest potential threat to tourism in Southeast Alaska.

Henry Gannett, a director of the U.S. Geological Survey and a member of the Harriman Alaska Expedition in 1899, truly understood the lasting importance of scenery to Alaska's economic future. In 1901, National Geographic magazine printed his essay which said in part:

*The Alaska coast is to become the show place of the earth and pilgrims, not only from the U.S., but from beyond the seas, will throng in endless procession to see it....The economic value of Alaska's grandeur... measured by direct returns in money received from tourists, will be enormous....Scenery is more valuable than the gold or the fish or the timber, for it will never be exhausted.*

Tourism is a sustainable, growing major industry and it is non-consumptive. Unless violation and destruction of natural landscapes is controlled, tourism cannot be assured of a resource base on which to depend. As the world becomes more developed, altered and urbanized, pristine places like Tongass roadless and wilderness lands become more exceptional and continue to appreciate in value.

### E. SUBSISTENCE ECONOMY THREATENED

What Congress gave Alaska with one hand in the subsistence provision of Title VIII of ANILCA, it may be taking away with the other in Title VII. Title VIII provided for protection of the Native and rural subsistence economy. It was a pioneering provision which recognized the unique relationship between Alaskans and the land and it attempted to ensure the continuation of that relationship. Through Title VIII rural residents were also to have a meaningful role in the management of fish and wildlife and of subsistence uses on the public lands. But the Tongass logging program, fueled in great part by Title VII's TTSF provision, now threatens destruction of the subsistence economy, and has consistently thwarted participation of rural Southeast residents in land use decisions.

Since human beings first came to Alaska, they lived in small, dispersed communities and depended on hunting, fishing, and gathering not only for their needs and materials, but also for their social identity and well-being. Today, hunting, fishing, and gathering are still a major focus of the rural way of life in Alaska. This applies to Native Alaskans as well as non-Native rural residents. Providing for personal survival and the survival of others enables subsistence users to incorporate cash-based transactions into a traditional social setting, and to thereby slowly integrate modern ways into older cultural values. The sharing of subsistence foods still plays a major role in rural cultural life, as it has always done. Furthermore, subsistence provides a measure of independence and freedom to some users that is uniquely Alaskan.

Primary subsistence foods in rural Southeast Alaska are deer and salmon, which comprise nearly 60% of the local food consumed in the region, according to the U.S. Fish and Wildlife Service. Other important subsistence foods include halibut, shellfish, and other marine life. As explained previously, deer and salmon are directly threatened by the adverse impacts of logging. Further, extensive road building in traditional hunting and fishing areas increases pressure on fish and wildlife resources, often resulting in restriction on seasons or limits. Finally, shellfish and other marine life are adversely impacted by log transfer facilities, which often poison the water of the coves and bays in which they are located.

The Forest Service has blinded itself to the impacts of its logging activities on subsistence, especially the cumulative impacts over the entire Southeast Alaska region. Over and over again, without the benefit of detailed study or even rudimentary research efforts, the agency has maintained that logging does not have significant impact on subsistence. SEACC has appealed the LPK 5-year plan because of impacts on subsistence. Regional subsistence impacts are a major concern with the current APC 5-year plan, as well.

The Forest Service also continually attempts to avoid its duties as manager and responsible agency for subsistence use on Forest Service lands, abdicating this role instead to the Alaska Department of Fish and Game, which manages the fish and game resources, but not the vital fish and game habitat. The Southeast Alaska Regional Council of Fish and Game Advisory Committees has addressed this issue and has found that all of its 19 Advisory Committees from communities throughout the region unanimously agree that "the 4.5 billion board feet per decade taken through clearcut logging practices...will have devastating results on the fish and game resources that Alaskans depend upon." Protection of Southeast's subsistence dependent rural communities must be undertaken before it is too late. If subsistence is lost, Alaska will be changed forever.



*Dip net fishing. SUBSISTENCE HARVEST of fish and wildlife resources is a way of life for many Southeast Alaskans.*

F. NATIVE TIMBER INDUSTRY STIFLED

When ANILCA was being finalized in 1980, conveyances of Tongass National Forest lands to Native corporations amounted to less than 4,000 acres of the 572,520 acres to which they were entitled under the terms of the Alaska Native Claims Settlement Act (ANCSA). By 1984, a total of 465,152 acres had been conveyed.

Since 1980 the production of timber from Native corporation lands has grown from non-existence to a full 47% of the total regional harvest. Native timber enterprises in Southeast Alaska produced an average annual harvest of 214 MMBF during the years 1982 through 1984. The Forest Service currently estimates that future private harvests will range from 225 MMBF to 350 MMBF.

The highest quality Native cut logs are exported to Japan. The primary market for Native pulp quality wood is the two local pulp mills. That market has been hindered by a pulp oversupply from federal, state, and private lands, and from British Columbia.

Native corporations claim they could provide a steady supply of pulp logs to the local mills. Native corporations have exported a small amount of pulp logs and have left in the woods as much as 20% of the timber volume in their harvest areas. Native land timber operators cannot recover operating costs on the sale of smaller pulp quality logs, so they often leave this timber. This unmarketable wood is not only a deteriorating or wasted asset, but the overall cost of production is significantly increased when the highest quality timber alone has to pay for an entire logging operation.

While felled Native pulp logs rot on the ground for want of a market, the Forest Service subsidizes high levels of Tongass clearcutting to supply pulp wood for the mills in Sitka and Ketchikan. The Forest Service subsidy is one big reason the Native corporations have trouble selling pulp quality logs.

In today's view, the TTSF definitely favors the APC and LPK mills over Native Corporations. To make matters worse, the 50-year contracts add the burden of unfair competition and limit the Native corporations' options. The biggest losers, though, are fish and wildlife habitat, and all who depend upon it.

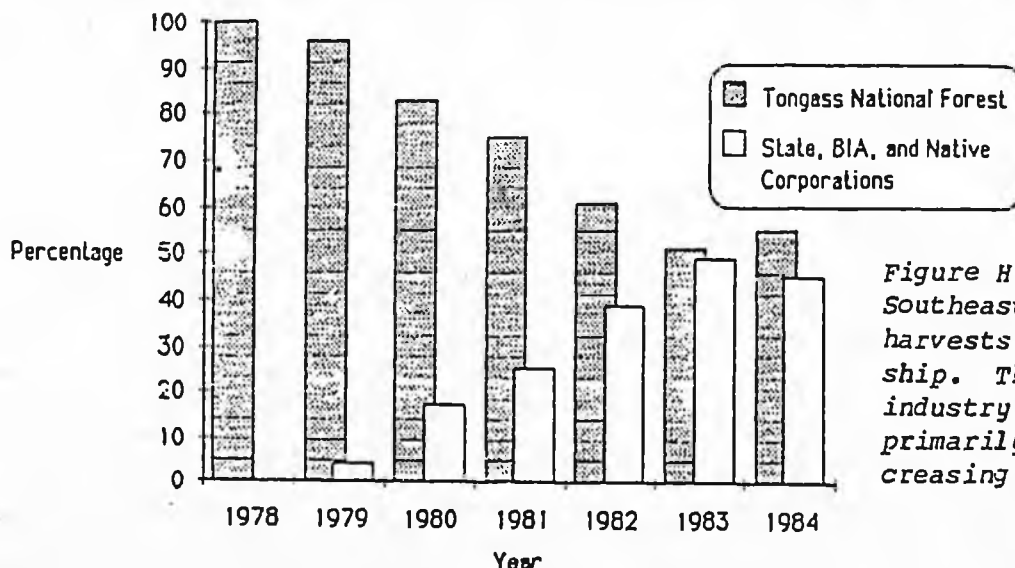


Figure H. Percent of Southeast Alaska timber harvests by land ownership. The timber industry is changing, primarily due to increasing Native harvest.

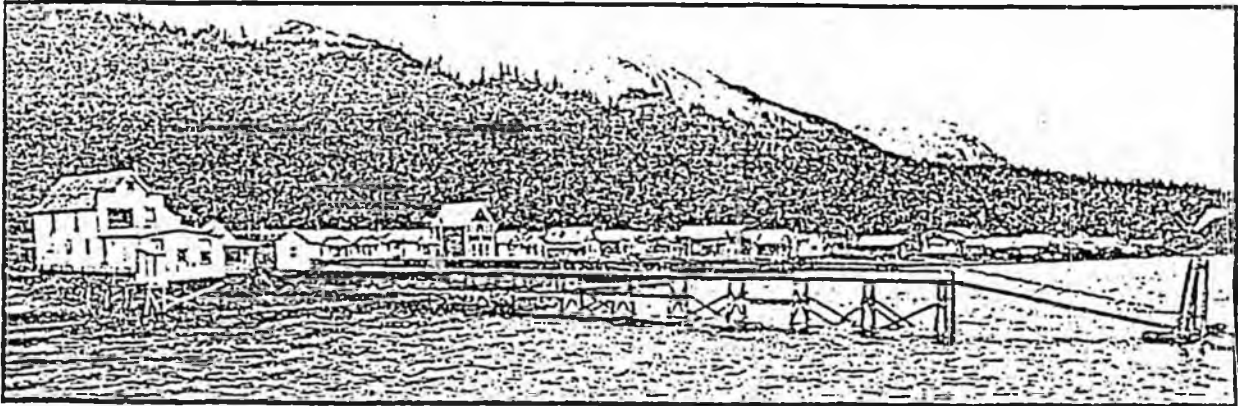
**Part IV**

**Southeast Alaskans Oppose  
Tongass Timber Management**



Previous Page: Current Tongass timber management impacts the livelihood of ALL Southeast residents.

#### IV. SOUTHEAST ALASKANS OPPOSE TONGASS TIMBER MANAGEMENT



*The city of TENAKEE SPRINGS OPPOSES current Tongass timber management program.*

The Forest Service is running into increasing opposition to its logging programs. While the debate over logging truly split Southeast Alaska during Congressional consideration of ANILCA, times have dramatically changed. Now, it is increasingly difficult to find a segment of the public, other than the two pulp mills (APC and LPK) and their subsidiaries, willing to defend the Tongass timber program.

For example, in response to Forest Service solicitation of public comments on alternatives for APC's 1986-1990 logging operations, the overwhelming majority of public comments supported either the alternative of no further logging or the alternative proposed by SEACC which protected many important areas.

Individual communities have also begun to take matters into their own hands. The towns of Yakutat, Elfin Cove, Pelican, Port Alexander, Tenakee Springs, Point Baker, Port Protection, and Edna Bay have passed resolutions opposing the current Tongass logging program, especially the 4.5 billion board feet per decade language of Section 705. The town of Hoonah has formulated its own, scaled-down plans for nearby APC logging operations. Hoonah's plans are aimed at protecting subsistence and providing a more even flow of timber than either of APC's or the Forest Service's cut and run alternatives. Public meetings in Juneau and Petersburg have presented the Forest Service with very strong public opposition to timber sales in Berners Bay and the Chuck River.

Finally, SEACC has travelled to towns all over Southeast Alaska collecting a list of critical areas which citizens would like to see deferred from logging. Over 100 areas can be found on this list, which was submitted to the Forest Service for the TLMP amendment process. To date, it is unknown if the Forest Service will protect these critical areas.

The State of Alaska has also requested measures to protect critical wildlife habitat in the national forests. In 1983, the Alaska Department of Fish and Game submitted to the Forest Service a list of critical areas integral to the maintenance of fish and wildlife populations on the Tongass. This Forest Habitat Integrity Program proposed to defer from harvest a mere 8% of Tongass lands now open to logging. It is also unknown at this time when, if ever, the Forest Service will address this proposal, but many areas in the State's deferral program have already been slated for logging or roading. Of 68 high value fish and wildlife habitat areas, at least 20 of these key habitats have

## Southeast Alaskans Oppose Management

been or are planned to be developed by Forest Service plans, including Berners Bay, the Yakutat Forelands, and Kadashan.

Even some Forest Service officials are voicing concern from within the agency. These dedicated professionals have taken a risky stance, since criticism of policy is not rewarded in the Forest Service bureaucracy. But they have come forward in the hope that "maybe this will do some good." One such Forest Service official stated, "The only thing I can say about the 450 million board foot cut is that the timber is not there [to sustain that level of harvest]. Everybody knows it, but the Forest Service won't admit it publicly." Another official explaining the pressure applied to meet this unreasonable harvest schedule said, "We're cutting the best timber and having a harder and harder time meeting the cut....[our district ranger] gets his marching orders to cut trees, and if he doesn't he'll be walking down the road kicking a can." A third official expressed "severe reservations that we can sustain 450 MMBF a year. The trade-offs between timber management and wildlife will be very tough...." But even these officials are just voices in the wilderness, as the Forest Service hierarchy is not listening to its own people, either.

The Forest Service has become so entrenched in its logging mandate mentality that public pleas have fallen on deaf ears. The agency is ignoring dynamically changing times and changing situations. Despite the fact that TLMP's assumptions about the health of APC and LPK, about the magnitude of Native logging operations, and about the environmental impacts of logging have all turned out to be very wrong, the agency steadfastly refuses to re-assess its logging program. The mandate imagined in ANILCA Section 705 is serving as an excuse for this behavior, the TTSF funds this behavior, the big pulp mills encourage this behavior, and TLMP does nothing to correct this behavior.

Recently, concerned citizens have had no choice but to resort to the courts for help. The City of Tenakee Springs, a small community on Chichagof Island, and SEACC sued the Forest Service in 1983 over construction of a logging road through the Kadashan River valley. On December 20, 1985, the Ninth Circuit Court of Appeals enjoined construction of the Kadashan road, finding the Forest Service's assessment of the project's environmental impacts to be "inadequate." For now, the important Kadashan watershed is protected.

In the summer of 1985, the Friends of Berners Bay (a Juneau ad hoc citizens organization), the Sierra Club, a local tour guiding company, and SEACC sued the Forest Service over plans to log and road Berners Bay, an outstanding recreation and wildlife area. The United States District Court for Alaska enjoined the Berners Bay project on August 26, 1985, again because of inadequate environmental analysis. Together, the Kadashan and Berners Bay cases represent clear disapproval by the Courts of the Forest Service's inadequate environmental analysis process and a warning to the agency that it must reform its procedures. The impact of these rulings on the Forest Service is not yet known, but it appears to date that the agency is still refusing to change.

Given the intransigence of the Forest Service regarding its logging program, many more lawsuits can be expected in the future. Litigation, however, is expensive, time consuming, and ultimately a poor substitute for responsible resource management by the Forest Service. It is clearly time for Congress to step in and correct this rapidly degenerating situation.

**Part V**

**Solving Tongass  
Timber Problems**

crossed to start the forest service

*Previous page: Winter snow blankets TONGASS OLD GROWTH.*

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## V. SOLVING TONGASS TIMBER PROBLEMS

The Tongass today is in grave trouble. The Forest Service's chapters in the report will not tell you that. Nor will the timber industry chapter. But you have read our view of the situation. Look also at the State of Alaska's view, the fishing industry's view, and at the Native corporations' views. We believe it is time that something be done to correct the course Congress set for Southeast Alaska in 1980 through ANILCA. Today, this course is set for long-term disaster.

Much of the ANILCA debate over land allocation in Southeast Alaska revolved around maintaining employment levels at the 1970-76 historic average. During the formulation of TLMP in 1978-79, SEACC offered a balanced alternative management program that proposed protection of more lands than are currently included in formal Wilderness, yet still maintained timber employment levels at very close to historic levels. This was based upon a 375 MMBF cut by the Forest Service and a 150 MMBF cut on Native lands, for a total annual cut of 525 MMBF. As has been shown, the average Tongass harvest level has been far less, while Native cut has greatly increased and averaged 214 MMBF per year since 1982. The commercial fishing industry has increased steadily and tourism has grown dramatically. The protection of wildlands is proving to be of direct benefit to the region.

Today, the Forest Service's management of the Tongass shows us that more conservative timbering goals are essential to ensuring a positive future for Southeast Alaska. We believe Southeast needs a scaled down timber industry and a long-term management program to protect key fish and wildlife habitat and subsistence resources. This will provide for timber employment on a sustainable basis, but not harm more important industries.

SEACC recognizes that long-term employment in the timber industry should continue. However, far flung road building efforts and extensive cutting in scattered drainages must cease. We cannot support the funding for pre-roading and below-cost sales. These practices must be replaced by the thinning and harvesting of second-growth forests in areas that have already been logged, and by greatly lowering the harvest level of nonrenewable old-growth forests. The timber industry should be allowed to restructure itself in a free market, unfettered by distorting government subsidies.

As forest expert, Tom Barlow, pointed out:

*Most of the virgin forest, especially high-volume areas, should remain unlogged for wildlife and fisheries protection. For Southeast, these untouched forest zones on federal lands will be even more important for habitat as timber harvesting proceeds on private Native holdings. This better future will not come without firm resolve and much hard work. On the course now so firmly set by Congress, the volume of timber cut in the ancient coastal rain forests will mount steadily and the number of acres being clearcut in Southeast will increase year by year. In a few short years most of the best of the world's rarest rain forest will be gone. And the American taxpayers will have paid handsomely to assure its passage to oblivion.*

## Solving Tongass Problems

The ANILCA language that allows Forest Service mismanagement of the Tongass National Forest can be rewritten by wise Congressional decisions today. The timber industry that utilizes the public's Tongass trees does not need the present level of timber supply. In fact, the two big mills controlling the Tongass timber industry are the ones who also want to continue control of the supply since they benefit directly from timber subsidies.

We urge the Forest Service to look back at its long and proud heritage as a conservation agency. The legacy of the Tongass is certainly not a credit to the Forest Service. Even if the agency persists in interpreting ANILCA Section 705 as a mandate, the Chief has the opportunity and ability to petition Congress to grant the Forest Service relief by repealing the Section 705 Tongass Timber Supply Fund language.

It is also time to break the domination of the two large, controlling mills and their outdated 50-year contracts. First Chief Forester Giffort Pinchot's policy for dealing with corporations should be enacted upon. His words ring especially true in the case of these contracts, "In the administration of the forest reserves it must be clearly borne in mind that all land is to be devoted to its most productive use for the permanent good of the whole people and not for the temporary benefit of individuals or companies." The Forest Service has the authority to cancel these contracts, and if the agency will not act, Congress should void the contracts in the public interest.

Finally, we hope that Congress will ensure, to mandate if need be, immediate and full compliance by the Forest Service with NFMA and NEPA in the Tongass Land Management Plan. Only through implementation of planning reforms can the Tongass successfully guide its own path.



Left: STRIVING FOR SOLUTIONS to Tongass timber management problems, Southeast citizens review maps. (Photo by Skip Gray)

Right: STRIVING FOR SOLUTIONS, SEACC's executive director, Bart Koehler (right), meets with Angoon fisherman, Gordy Williams. (Photo by Julie Kelly)



# Conclusion



*Previous page: The late DR. OLOF C. WALLMO, a Forest Service research scientist, studied Sitka black-tailed deer in the old-growth forests of Southeast Alaska.*

## CONCLUSION

The Tongass is our last great rain forest. It is our nation's largest, most magnificent public forest reserve. It is also the most threatened. Nothing can ever re-create this old growth forest as we know it today. The sooner resource managers face up to that fact and start looking at the long term impacts on the forest, the better off the public forest resources and the public will be.

In 1982 at a conference in Oregon, biologist Dr. O.C. Wallmo addressed the ecological aspects of managing old growth forests throughout the Pacific Northwest:

*Over large areas, thousands of acres, the old-growth forest offers a multifarious mosaic of plant and animal habitats. Centuries are required for the fullest expression of that complexity...The forests that were logged when Weyerhaeuser moved in will be entering the old-growth stage when your great-great-great-great-great-grandchildren are looking for a place to hike and camp and listen to bird songs...As a member of society who ponders the question of who and how many benefit from the decimation of natural resources, I think it is in the general interest to preserve the remaining old-growth forests.*

Incredibly, the Forest Service contends that Southeast Alaska has not changed dramatically from the days when John Muir first explored this region in 1879. But, the facts and the record do show dramatic impacts. The Tongass National Forest has experienced profound changes since Muir wrote this passage about a special Tongass island: "Wrangell Island...like all its neighbors, is densely forested down to the water's edge with trees that never seem to have suffered from thirst or fire or the axe of the lumberman in all their long century lives. Beneath soft, shady clouds, with abundance of rain, they flourish in wonderful strength and beauty to a good old age...." This is hardly the Wrangell Island we see today.

Look far across the Tongass. Look from the Alaska mainland to the distant Forelands of Yakutat and to the islands of Zarembo, Kuiu, Baranof, Chichagof, and Prince of Wales that lie in between. As you look across this forest, you will see that the Tongass is in trouble, threatened by a logging industry that does not fit in with the delicate balance and harmony of life in this region.

The forces of the earth that created this great forest are timeless. But it is not too late to stop the destruction of this land. Congress has the power to turn this troubled national forest around; to help build a lasting stable economy for all the people of Southeast Alaska; to end waste, fraud and abuse of public money and resources; to bring balanced multiple-use management to the Tongass; and to ensure maintenance of those uniquely Alaskan qualities that make up life on the last frontier. Now is the time for Congress to act to change the course of the Tongass National Forest for the long-term benefit of the American people.

## SEACC's Recommendations

To bring balanced multiple use to the Tongass, SEACC respectfully urges Congress to adopt the following measures:

- A. Repeal ANILCA Section 705, thus eliminating the Tongass Timber Supply Fund and references to a 4.5 billion board foot per decade supply goal.

This will force the Forest Service to be cost-effective and accountable. It will allow free markets and other important resource needs to set the harvest level. This will, in turn, stop needless construction of roads and other facilities in roadless areas and stop the subsidy of timber mining. A more responsible timber management program will result.

- B. Cancel the 50-year contracts and replace them by competitive bidding and short-term sales, and repeal Sec. 1315(e) of ANILCA.

APC and LPK could still buy timber, but would no longer dominate other timber operators or other resources or the Forest Service. APC and LPK would only buy what they could utilize instead of banking timber. This measure would allow greater flexibility for land allocations, competitive bidding, and the protection of key habitat areas and subsistence resources. It would also ensure the survival and future of independent timber operations. Many independent timber operators believe that abolishing ANILCA Section 705 without cancelling the contracts will not help because the two big mills would then just take the entire allotment.

- C. Order immediate full revision of TLMP to comply with NEPA and NFMA and re-establish the applicability of Section 6(K) of NFMA to the Tongass.

This would bring Tongass planning into the 1980's. It would give the public its rightful say over public lands, and it would force the Forest Service to be accountable, justify plans, and explain assumptions. This measure would also require the Forest Service to consider economic feasibility when planning timber sales, thereby reducing Tongass timber program losses.

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# STATE OF ALASKA

## OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET  
DIVISION OF GOVERNMENTAL COORDINATION

BILL SHEFFIELD, GOVERNOR

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October 3, 1985

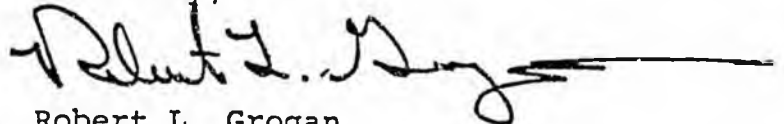
Mr. Michael A. Barton  
Regional Forester, Alaska Region  
U.S. Department of Agriculture  
Forest Service  
P.O. Box 1628  
Juneau, AK 99802

Dear Mr. Barton:

Enclosed for insertion in the 1985 report to Congress on the status of the Tongass National Forest are the VIEWS OF THE STATE OF ALASKA: THE EFFECTS OF THE ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT AND ITS IMPLEMENTATION ON SOUTHEAST ALASKA. You have already received the State's page-specific comments resulting from its review of your July 19, 1985 draft report.

We appreciate the opportunity which Congress has given the State of Alaska and the others identified in ANILCA Section 706 (c) to participate in this important report. We also appreciate the efforts which you and your staff have made to keep us informed and involved in the process of report preparation. We look forward to reviewing the completed report which will contain the views of the other Section 706 (c) participants, and your summary findings and conclusions. Thank you for giving us this opportunity to review the implementation of ANILCA.

Sincerely,



Robert L. Grogan  
Director

Enclosure

cc: Governor Bill Sheffield, Juneau  
Senator Ted Stevens, Washington, DC  
Senator Frank Murkowski, Washington, DC  
Representative Don Young, Washington, DC  
Commissioner Wunnicke, DNR, Juneau  
Commissioner Collinsworth, DFG, Juneau  
Commissioner Ross, DEC, Juneau

cc continued: Commissioner Lounsbury, DCED, Juneau  
Commissioner Nordale, Reveneue, Juneau  
Commissioner Notti, DCRA, Juneau  
Commissioner Robison, Labor, Juneau  
Commissioner Knapp, DOTPF, Juneau  
Attorney General Brown, Law, Juneau  
John Katz, Special Counsel, Washington DC  
Vernon R. Wiggins, Federal Co-Chairman, ALUC,  
Anchorage  
Robert Loescher, Sealaska Corporation, Juneau  
James F. Clark, Robertson, Monagle, Eastaugh, and  
Bradley, Juneau  
Bart Koehler, SEAAC, Juneau  
Cass Elliott, United Fishermen of Alaska, Juneau  
Gordon Williams, Southeast Alaska Regional Fish  
and Game Council, Angoon

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VIEWS OF THE STATE OF ALASKA:

THE EFFECTS OF THE ALASKA NATIONAL INTEREST  
LANDS CONSERVATION ACT AND ITS IMPLEMENTATION ON  
SOUTHEAST ALASKA

Prepared in accordance with Section 706(b)  
Alaska National Interest Lands Conservation Act of 1980,  
P.L. 96-487

State of Alaska  
October 1985

Juneau, Alaska

October 1985

VIEWS OF THE STATE OF ALASKA:

THE EFFECTS OF ANILCA AND ITS  
IMPLEMENTATION ON SOUTHEAST ALASKA

As a participant named in Section 706(c) of the Alaska National Interest Lands Conservation Act of 1980 (Public Law 96-487), the State of Alaska has cooperated and consulted with the U.S. Forest Service in its preparation of a report to Congress on the status of the Tongass National Forest. In addition to reviewing and commenting on the Forest Service draft report dated July 19, 1985, the State has prepared this document which represents its views. After describing the State's interest in federal management of the Tongass National Forest, and the evolution of a timber industry which arose from early federal decisions, the purpose of the report required by Section 706(b) of the Act is described. A section which summarizes the State's views and recommends certain actions by Congress and the U.S. Forest Service precedes discussions of the four topics specifically identified for study by Congress: timber harvest levels, small businesses in the dependent industry, impacts of wilderness designation, and fish and wildlife protective measures.

1. INTRODUCTION

The State of Alaska was an active participant during the legislative process which culminated in the 1980 enactment of the Alaska National Interest Lands Conservation Act (ANILCA). The State of Alaska remains interested in federal implementation of this landmark legislation in the Tongass National Forest. This interest arises from the fact that the Forest Service, despite Congressionally authorized land grants to Alaska Natives and the State, is still the dominant land manager in southeast Alaska.

Alaskans residing in many communities of southeast Alaska are, to a high degree, directly or indirectly dependent on the natural resources which are managed by the Forest Service or may be affected by management of the Tongass Forest. These include people employed in the timber industry as loggers, road builders, and mill workers, commercial fishermen and fish processors in the major regional fisheries, people engaged in the tourism industry, those who use fish, game, and plant resources for subsistence purposes, and many others who are sport hunters and fishermen. Because of this dependency, the State of Alaska will continue to have a high degree of interest in Forest Service implementation of ANILCA, and the management decisions affecting the resources and residents of this coastal region.

In the Tongass National Forest, Congress had to deal with an extremely complex situation. Despite many years of effort by various national and local conservation and environmental interests no Congressional protection had been given to wilderness values in the Nation's largest national forest by the mid-1970's. Although the Forest Service had administratively set aside some land in its natural state for recreation and other non-consumptive uses, these actions were considered inadequate by many.

Very early in the history of the Tongass Forest, Forest Service officials attempted to create a timber industry in the region which would enhance community stability and provide more year round employment for Alaska residents. Congress has acted several times to affirm this social objective. More than 30 years ago, as a result of Forest Service efforts, long-term timber sale contracts were awarded with a requirement that trees harvested from the Tongass receive primary processing before leaving Alaska. Pulp mills were located in Ketchikan and Sitka, and sawmills were subsequently constructed in several communities to convert higher quality logs into squared cants (which could be further manufactured in Japan). In many of these communities, the arrival of the forest products industry meant the addition of a major new contributor to the local economy.

Thus, faced with an existing mature timber industry established through the early efforts of the federal government, Congress sought to craft a unique compromise solution which would maintain employment in that industry while responding to a national desire for wilderness, and assuring that other resource values, and other public uses, would be protected on nonwilderness land.

In designating over five million acres of the Tongass as Wilderness, Congress also implicitly recognized and confirmed the long-standing social objective of the Forest Service's Tongass timber program by providing for the maintenance of employment in the timber industry which was dependent on national forest timber supplies. This employment objective was to be achieved by ensuring a timber supply of 4.5 billion board feet per decade. Recognizing that some of this timber would need to be harvested from economically and technologically marginal lands, Congress exempted the Tongass Forest from the provisions of Section 6(k), National Forest Management Act (which generally precludes National Forest land not suitable, by reason of physical, economic and other pertinent factors, from timber harvesting and production), and provided an unprecedented funding mechanism (a continuing appropriation of \$40 million

or more per year as needed which was not subject to rescission or deferral) to ensure the necessary timber supply.

An expression of Congress' finding at the conclusion of ANILCA deliberations is contained in Section 101(d):

This Act provides sufficient protection for the national interest in the scenic, natural, cultural and environmental values on the public lands in Alaska, and at the same time provides adequate opportunity for satisfaction of the economic and social needs of the State of Alaska and its people; accordingly, the designation and disposition of the public lands in Alaska pursuant to this Act are found to represent a proper balance between the reservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition, and thus Congress believes that the need for future legislation designating new conservation system units, new national conservation areas, or new national recreation areas, has been obviated thereby.

2. PURPOSE OF THE REPORT REQUIRED BY ANILCA SECTION 706(b)

The State described its understanding of the purpose of the report to Congress in a letter to the Forest Service dated August 31, 1984 as follows:

The 1985 report (and subsequent reports) should inform Congress and the public about the status of the Tongass following passage of ANILCA and its implementation. In considering the establishment of wilderness areas in the Tongass National Forest, Congress gave unprecedented recognition to the other competing demands on the forest. Chief among these was its concern for the maintenance of employment in the timber industry dependent on national forest timber. This concern was expressed by ensuring adequate federal funding to provide a specified timber supply to the dependent industry while providing for other public uses of the Tongass and protection of other resource values consistent with federal law.

We think that the report should describe how well the balance which Congress sought is working. If achievement of that balance

requires further legislative action, the mandated reports to Congress should provide a factual basis for such action. If the balance can be accomplished without Congressional intervention, the public and Congress should be informed of Forest Service measures to attain that balance.

The legislative history of ANILCA is clear in its recognition that some information provided to it by the Forest Service, and several assumptions used in crafting the compromise solution, might be subject to correction or revision as time passed, or as a better understanding was gained of economic, social and biological relationships. As a result of potentially incorrect assumptions, or poorly understood relationships, full implementation might be difficult or produce undesirable consequences. This recognition of uncertainty is part of the basis for the reporting requirement of Section 705(b).

### 3. SUMMARY AND RECOMMENDATIONS

A complete evaluation of Congress' legislative solution to accommodate competing demands for the Tongass National Forest is not possible at this time because the provisions of Section 705 have not been fully implemented by the U. S. Forest Service. Congress fixed the amount of Tongass Forest which would be preserved for future generations in Wilderness, and by providing a unique funding provision to assure a timber supply, intended to maintain employment in the existing timber industry. Congress' employment objective has not been met.

The timber supply was to come from lands not set aside as Wilderness, and included land which was not suitable for timber harvest for economic and technological reasons. To assure that sufficient timber was provided which would maintain timber industry employment, a continuing appropriation of \$40 million (or as much as was necessary to achieve the employment objective) was made available to the Secretary of Agriculture. It is the State's position that the executive branch of the federal government has failed to properly implement this funding provision over most of the past five years since ANILCA's enactment, both in terms of amounts of money, and in the manner utilized. The State also believes that the Forest Service, by its failure to properly implement ANILCA Section 705, and by its failure to fully implement the Tongass National Forest Management Plan adopted in 1979, has jeopardized the economics of future timber harvesting and State wildlife and fisheries resources. The State urges Congress to conduct its own

investigation of the Forest Service's implementation of ANILCA, and the validity of Tongass Land Management Plan assumptions and information which were utilized by Congress during ANILCA deliberations. To assist Congress in its consideration of the status of the Tongass National Forest following enactment of ANILCA, and the U. S. Forest Service in fulfilling its obligations and commitments, the State of Alaska recommends the following:

Recommendations to Congress

1. Congress should conduct its own inquiry into the implementation of ANILCA Section 705 and the issues raised by the State relative to Section 706.
2. A Congressional inquiry into ANILCA implementation should include consideration of the assumptions and information of TLMP which were utilized during its deliberations. These would include the following:
  - a. the extent to which employment losses in the timber industry, which is dependent on national forest timber supplies, are caused by Forest Service funding shortfalls, improper utilization of available ANILCA funds, and uneconomic timber supplies;
  - b. the extent to which the export of round logs from Native-owned land in Alaska is displacing the export of cants manufactured from national forest timber;
  - c. the extent to which Forest Service implementation of ANILCA and TLMP is causing, or is likely to cause, unacceptable adverse impacts to the State's fish and wildlife resources and public uses of the Tongass National Forest.

Recommendations to the Forest Service

1. The Forest Service should provide funds as intended by Congress for the construction of roads for access to economically and technologically marginal stands, advanced logging technology, and precommercial thinning sufficient to maintain employment in the dependent timber industry.
2. The Forest Service should immediately implement the loan program intended by ANILCA Section 705(b).

3. The Forest Service should apply funds for preroading purposes to roads which will most efficiently access economic timber, in areas where timber harvest is imminent, and in a manner which will protect other resource values as provided by law and adopted management plans.
4. The Forest Service should, in reporting to Congress on timber supply from the Tongass Forest, describe what portion of the supply considered to be "made available" is actually economic to harvest.
5. One use of Tongass Timber Supply funding should be to protect high-value fish and wildlife areas by improving the economics of sales in areas of low habitat value.
6. The Forest Service should foster increased employee understanding of the Tongass Land Management Plan to ensure full and consistent implementation.
7. The Forest Service should continue working with the timber industry to reduce logging costs where appropriate, while assuring that cost reductions will not impair, or adversely impact, other resource values and public uses in the Tongass National Forest.
8. The Forest Service should ensure that adequate funding is provided to permit an increased level of implementation and monitoring of measures to protect fish and wildlife resources.
9. The Forest Service should conduct, on a routine basis, the standardized project-level monitoring and reporting on measures implemented to protect water quality, with special emphasis on watersheds which are sources of public drinking water.
10. The Forest Service should report to Congress the effectiveness of its measures to protect fish and wildlife in the Tongass Forest.
11. The Forest Service should identify and schedule additional permanent retention acreage for fish and wildlife habitat to compensate for the acreage of unregulated timber that has been harvested and the acreage that has not been placed under extended rotation scheduling to meet visual quality objectives.
12. The Forest Service should conduct life-of-the-sale and life-of-the-rotation planning to identify retention acreage for fish and wildlife and to analyze the

cumulative effects of options for multiple entries and/or sale lay-outs.

13. Management Area Analysis which is the intermediate level of planning between TLMP and project plans should be fully implemented as a second tier of NEPA review.
14. The Forest Service should analyze the effects of timber harvest deferral beyond 1989 of those areas that DFG has identified as being of high value for fish and wildlife.
15. Mitigating measures which are of a short-term effectiveness or the effectiveness of which has not been demonstrated should be described and treated as such during analyses of impacts.

Specifically, pre-commercial thinning, commercial thinning, prescribed burning, slash treatment, and management of large woody debris in or adjacent to streams should be considered experimental measures until their effectiveness is demonstrated.

The usefulness and limitations of various models being used, or proposed for use, in forest planning should be described.

16. Logging system and transportation analyses should be conducted prior to pre-roading and options should be considered to reduce impacts on fish and wildlife and to maintain the types of hunting and fishing opportunities desired by the public.
17. Planning for snag management and retention of residual groups of trees should occur.
18. The Forest Service should carefully evaluate its practice regarding harvesting of unregulated, oversteepened slopes to see if these practices are in conformance with TLMP and the NFMA.
19. The Forest Service should give full consideration to all feasible mitigation measures to protect the esthetic importance of high value sport fishing areas.
20. The Forest Service should ensure complete protection of the biological productivity of all fish streams in conformance with NFMA.
21. The Forest Service should, in delineating areas for retention, consider maintaining undisturbed buffers

around the nest areas of certain other raptor species such as osprey and peregrine falcon, in addition to eagles.

22. The Forest Service should monitor and keep records of:
  - a. Retention acreage - to be mapped and permanently removed from the timber base per the TLMP assumption.
  - b. Wildlife Habitat Management Units and Fisheries Habitat Management Units and their prescriptive management.
  - c. Management of habitat for Management Indicator Species (assuming that selection occurs per NFMA requirements).
  - d. Decisions to harvest leave strips retained for fish and wildlife.
  - e. Decisions to permit harvesting adjacent to clearcuts in which regrowth has only reached five feet in height.
  - f. The status of regrowth habitat on the TNF; the distribution, juxtaposition, and ages of stands.
  - g. Fish and wildlife habitat management results in the context of acres harvested, acres to which effective mitigation treatments have been applied, acres to which experimental mitigation treatments have been applied, and expected duration of mitigation.
23. The Forest Service should include Alaska in its Old-Growth Forest Wildlife Habitat Research and Development Program and initiate cooperative research to further describe vertebrate community ecology, species-specific habitat requirements, and the island ecology of the region's old-growth forests.
24. Standardized, comprehensive project-level monitoring and reporting on measures implemented to protect fish and wildlife resources should be conducted.
25. The monitoring requirements in NEPA documentation for individual plans and projects should be fulfilled.
26. The Forest Service should develop a consistent approach to conducting subsistence evaluations of its planned timber harvesting and associated activities as required by Section 810, ANILCA, and should utilize guidance of

the Alaska Land Use Council, and the DFG Subsistence Division.

4. TIMBER HARVEST LEVELS

This report shall include...the timber harvest levels in the forest since the enactment of this Act... (ANILCA Section 706(b))

The declining harvest of national forest timber in the five years following enactment of ANILCA has been well documented. This dramatic decline has been attributed by the Forest Service to reduced market demand and displacement of cant sales by round log exports from private lands. The Secretary of Agriculture, in each of the annual reports required by Section 706 (a) on timber supply and demand, has reported to Congress that "the available land base in the Tongass National Forest...is adequate to maintain the timber supply...to the dependent industry at a rate of 4.5 billion board feet per decade."

The State of Alaska emphatically does not agree with that conclusion, and urges the Congress to conduct its own investigation of Forest Service performance in maintaining employment in the dependent industry. Although the State agrees that the available land base appears to have the silvicultural potential to sustain a timber harvest of 4.5 billion board feet per decade, the State does not agree that this land base is adequate to provide an economic timber supply, in the absence of adequate ANILCA funding, without severely impacting fish and wildlife habitat. At the level of funding which the Forest Service has obtained in recent years (pursuant to ANILCA Section 705 (a)) public investments in the Tongass Forest have fallen far short of Tongass Land Management Plan (TLMP) assumptions and the intent of Congress. A significant share of the land base identified in TLMP for timber production is not currently available to the dependent industry in an economic sense.

Several consequences arise from this investment shortfall, including a dependent timber industry forced to pay for public roads (to access deficit sales) which rightfully should be funded by the Forest Service, a disproportionate harvest of high volume stands (with implications for the future economic viability of timber harvest and impacts on important wildlife habitat), and attempts by the Forest Service to aid a distressed industry by emphasizing logging cost reductions, rather than offsetting with public investments the increased logging costs associated with marginal operations.

By providing an assured timber supply and funds to offset economic and technological marginality, Congress intended to maintain employment at historic pre-ANILCA levels in the timber industry which is dependent on the Tongass National Forest. Clearly, the Congressional objective has not been achieved. Southeast Alaska's timber industry, which is largely the result of early efforts by the federal government, has been in a severely depressed condition for the past several years.

Congress established the Section 705 funding provision based, in part, upon certain assumptions contained in the Forest Service's 1979 Tongass Land Management Plan. The ANILCA funding provided thus far has neither kept pace with inflation, nor TLMP objectives. If the full ANILCA funding were obtained and utilized as intended by Congress, and historic pre-ANILCA employment levels are still not achieved, then the solution which Congress devised in ANILCA would be demonstrably unworkable. As it stands now, we can only surmise the employment effects which full funding would achieve.

5. SMALL BUSINESSES IN THE DEPENDENT TIMBER INDUSTRY

This report shall include...the status of the small business set aside program in the Tongass Forest. (ANILCA Section 706(b))

The Forest Service, in cooperation with the Small Business Administration (U. S. Department of Commerce), established a timber sale program well before the passage of ANILCA which was intended to give special recognition to small businesses. Qualifying small businesses were able to bid on national forest timber sales without competition from larger companies. They only had to bid against each other. The Forest Service's assessment of the status of the small business set-aside program occupies five and one-half pages of its draft report, and in the State's view, does not adequately describe this important program which was designed to help maintain the viability of small firms dependent on national forest timber.

As the SBA set-aside program is wholly administered by the federal government, it has the capability and the data to provide a much more informative status report. The State of Alaska believes that such a report should contain a detailed presentation of qualifying firms which existed prior to the passage of ANILCA, and the entry and departure of qualified firms subsequent to ANILCA (including a description of the factors which account for each change). The status of dependent small businesses, and their role in overall

employment in the dependent timber industry, should include a listing of the number of people which each qualifying firm has employed annually each year since 1979, the volumes purchased and actually harvested, and the mileage and value of contract-specified roads built by each firm with effective purchaser credits, and where purchaser credits were not effective.

6. IMPACTS OF WILDERNESS DESIGNATION

This report shall include...the impact of wilderness designation on the timber, fishing, and tourism industry in southeast Alaska... (ANILCA Section 706(b))

A key component of Congress' interest in receiving Tongass status reports was the effect of its wilderness designations on timber, fishing, and tourism industries.

A. Timber Industry

The principal effect of wilderness designation on the timber industry was an acknowledged necessity to harvest timber on marginal land. The increased cost of providing access to, and operating in, such marginal lands was to be absorbed by the federal government. Expenditures were contemplated in road construction, advanced logging technology, and thinning of young timber stands to increase their future yield.

Harvesting of marginal stands has, however, fallen far short of TLMP objectives in terms of proportional amounts. While depressed market conditions and displacement of national forest products may account for a significant share of this shortfall, the failure of the Forest Service to provide sufficient ANILCA funding is also a significant factor. The Forest Service, in other words, is not willing to pay the price of Wilderness. This unwillingness has contributed to significant employment losses in the dependent timber industry, and an emphasis on logging cost reductions to relieve this economic distress. The State encourages consideration of additional cost cutting measures, but not at the expense of other resource values and public uses in the Tongass Forest.

B. Fisheries Industry

Wilderness designation, with the ANILCA provision which authorizes aquaculture facilities, has given assurance of long-term protection from management-induced hazards

to water quality and anadromous fish streams, as well as permitting enhancement potential.

Timber harvesting and associated activities outside of wilderness areas constitutes the greatest potential for management-induced risks to commercial fisheries. Neither short-term nor long-term cumulative effects of timber harvesting activities on water quality are clearly understood, since water quality monitoring is not carried out on a routine project-specific basis in the TNF. The Forest Service has stated its commitment to fully protect the biological potential of fisheries habitat in non-wilderness areas of the Tongass Forest. Measures instituted by the Forest Service to reduce logging costs have not, thus far, been demonstrated to be detrimental to the fisheries resource. There have, however, been measures proposed recently which concern the State. Enhancement of timber harvesting economics should come primarily from public investments as intended by Congress. The Forest Service noted that most problem areas which were identified in its 1984 evaluation of TLMP could have been resolved had "the full implementation of TLMP been more of an on-going Regional priority." As indicated below, the State believes that such implementation could have ensured a higher degree of fish habitat protection.

c. Tourism Industry

The Forest Service has concluded that Wilderness areas in the Tongass Forest have not yet evidenced any large scale increase in use and identifies several ingredients which are essential to facilitating increased recreation use. Many Alaskans and non-resident tourists utilize non-wilderness portions of the Tongass Forest for recreational purposes. This is, to some extent, a consequence of proximity and accessibility from existing communities, and the nature of the recreational activities. If timber harvesting and associated activities outside of designated wilderness areas proceeds according to TLMP assumptions, certain kinds of public recreational activities, including sport hunting, may be altered. To the extent that timber harvesting and road construction will occur in the Tongass Forest on land not considered prior to ANILCA to be part of the commercial forest base, recreational and tourism activities in these areas will be indirectly impacted by the passage of ANILCA.

7. FISH AND WILDLIFE PROTECTIVE MEASURES

This report shall include...measures instituted by the Forest Service to protect fish and wildlife in the forest... (ANILCA Section 706(b))

The fish and most wildlife species which inhabit the Tongass National Forest, or utilize waters within or flowing from the forest, belong to the citizens of Alaska, and are managed for them by the Alaska Department of Fish and Game (DFG) in accordance with the State Constitution and statutes. Nonresidents also utilize these species as provided by State law. As a consequence, federal management of the Tongass National Forest as it affects the habitats of these State-managed resources is a matter of direct concern to the State and its residents. The potential for adverse impacts from timber harvesting and associated activities is usually greatest on those portions of the Tongass Forest which possess commercial timber values outside of designated Wilderness areas. The users of State fish and wildlife resources are negatively impacted to the extent that the habitats of these fish and wildlife are adversely affected.

The State considers the report which the Secretary of Agriculture will submit to Congress this December, and every two years thereafter (in accordance with Section 706(b) of ANILCA), as an important opportunity for the Forest Service to clearly indicate to Congress not only what has occurred on the Tongass Forest with regard to fish and game resources since passage of ANILCA, but to make recommendations for the future. Most importantly, the 1985 report should provide a clear and concise evaluation of the effectiveness of current Forest Service programs, and measures taken, to protect fish and wildlife. We find, however, that the Forest Service document which the State has reviewed does not fulfill these objectives.

The State has identified the following fish and wildlife issues as ones which should be considered by Congress: (1) the impacts of logging related alteration of old-growth habitats on wildlife, (2) the degree to which fish habitat protection measures have been implemented, (3) the degree to which those measures which have been implemented have been effective, and (4) the resulting effects of timber harvesting on commercial, sport, and subsistence users of the fish and wildlife resources of the Tongass National Forest (TNF).

Based on a detailed DFG analysis<sup>1</sup> of Forest Service management of the Tongass, the State concludes that the planned timber harvest will have adverse impacts on wildlife habitat in areas designated by TLMP for commercial forest management and will reduce yields from these areas to users in the course of the 100 year harvest rotation. Forest Service efforts to reduce costs and improve the economics of the currently depressed timber industry include measures that may accelerate adverse impacts on wildlife, and may not conform to habitat protection requirements provided for in TLMP and other Forest Service authorities. Reduction of standards designed to protect salmon habitat has been suggested as a means to reduce the costs of logging as well. While the State does support cost reductions, it does not support cost reductions that lead to increased adverse impacts on fish, wildlife, or water quality. Any additional enhancement of timber harvest economics should come from ANILCA funds as intended by Congress.

The potential long-term adverse impacts of clearcut logging on the fish and wildlife species in the region have been particularly well documented for the Sitka black-tailed deer and rearing salmon and trout. Simply stated, old growth stands of timber consist of trees of all ages and contain openings where large trees have fallen and browse plants have temporarily taken advantage of available sunlight. The close juxtaposition of large trees that can intercept snowfall and browse plants that provide food can sustain deer through harsh winter months. This old growth forest condition can, in southeast Alaska's damp maritime climate (where forest fires are neither common nor widespread), perpetuate itself for indefinite periods. Moreover, these two important characteristics of snowfall interception and browse availability have not yet been demonstrated to result from even the most intensively managed second growth timber stands.

Research also indicates that adverse impacts can be expected for moose, black bear, brown bear, mountain goat, marten, wolf, land otter, cavity-nesting birds, and other bird and small mammal species requiring aspects of old-growth forest.

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<sup>1</sup> Status of measures to protect fish and wildlife in the Tongass National Forest: A Report on Section 706(b) of the Alaska National Interest Lands Conservation Act. Preliminary copy prepared by the Alaska Department of Fish and Game, August 30, 1985.