



February 22, 2016

M. Earl Stewart  
Forest Supervisor  
Tongass National Forest  
Attn: Forest Plan Amendment  
648 Mission Street  
Ketchikan, AK 99901  
Sent via email: [comments-alaska-tongass@fs.fed.us](mailto:comments-alaska-tongass@fs.fed.us)

Dear Mr. Stewart,

The Petersburg Borough's Planning Commission has a number of concerns with the proposed amendments to the Tongass Plan. Some are more general dealing with the direction of the plan and others address specific areas of the plan.

After reading through the proposed land and resource management plan amendments, we are concerned with the overall direction the Forest Service is taking with the management of our timber resources. While general guidelines and limits should be set for the Tongass N.F. as a whole, we believe more local input is needed in how the resources are managed in any given district/municipality so the forest is managed in a way that best fits each district/municipality's recreational, environmental and economic needs.

Our primary concern is the long-term end game of this amendment is to manage harvest of second-growth timber on a relatively short harvest cycle thus leaving little of the managed forest in a mature state. Harvesting on a short cycle has negative environmental and economic impacts to our community.

The proposed plan amendments recommends harvesting timber just as it reaches maturity. Mature forests provide necessary habitat for many species. On Mitkof and Kupreanof Islands, for example, a major concern is loss of mature forest habitat for deer populations. Mitkof Island has the most restrictive deer hunting season in the region, yet the plan amendments propose the same short-harvest cycle on Mitkof Island as in other areas with healthy deer populations. By harvesting smaller quantities of timber annually and allowing longer recovery periods, there will be more mature timber stands than the plan amendment proposes.

We also have serious concerns with language in the plan amendments potentially allowing commercial harvest within the beach fringe and riparian management areas. The Petersburg Borough is home to a large fishing fleet and any amendments adversely

affecting the long-term sustainability of our fisheries is a major concern in our community. We strongly recommend that no plan amendments be approved to reduce or weaken current protection of anadromous streams and beach-fringe habitat.

Under the proposed amendments, approximately 1/75th of our managed available timber will be harvested each year, very little of it in a mature forest state. The timber produced from this harvest will be of a relatively low-grade and only suitable lower grade building materials. This type of timber program will only work for a relatively large, high-production regional mill operation, or for round log export. While regional mills or round log export will benefit one or two communities in Southeast Alaska, they provide little economic benefit to the other communities.

There are no high-production mills in Petersburg, but we are home to a growing number of small mill operations. In order for our forest products sector to succeed, our small mills require a small but steady supply of higher grade timber. Higher grade timber will provide 2-3 times the revenue per board foot harvested allowing small mills to be profitable even though harvesting much lower volumes of timber. The proposed plan amendments do not provide supply for this sector of the forest products industry.

Based on all of these concerns, we recommend the Forest Service allow districts/communities to request harvest at a slower rate on some or all of their surrounding lands. This would have the benefit of supplying higher quality timber for small mill operations that are the only growing area in the forest products sector in Southeast Alaska.

In addition, the Forest Service should consider differentiating the value of old growth and mature second growth (>150-200 years) vs. young second growth (< 85 years) and charge accordingly. This would allow the agency to generate the same revenue per acre/year harvesting on a longer cycle vs a shorter cycle.

In short, the emphasis should not be on gross board feet harvested per year, which puts the emphasis on how fast can we grow big trees, but rather to have a method accounting for the quality of the timber harvested as well.

Additionally, we have some specific concerns with some sections of the plan.

1) Page 5-12 O-RE-01 says "During the 15 years after plan approval, encourage renewable energy production. Our participation in responding to renewable energy would be in the priority order of whether they lead to:

1. A decrease (in) the number of Southeast Alaska rural communities powered by diesel generators,
2. An increase in existing renewable energy capacity, or
3. An export of renewable energy resources without benefit to Southeast Alaska communities."

The Petersburg Borough Planning Commission does not agree with #3 in this section. The Committee feels that #3 should be reworded, and that exporting energy resources from the forest should always benefit Southeast Alaska communities.

2) Page 5-14 O-TS-01 says "Cooperate with other agencies in developing 35 miles of transportation corridors during the 15 years after plan approval"

The Petersburg Borough Planning Commission questions the need to be so specific on the number of miles of transportation corridors. Why state the number 35? What if funding became available to develop 50 miles? Or 75? The committee suggests removing "35 miles of" from this objective so that it reads "Cooperate with other agencies in developing transportation corridors during the 15 years after plan approval"

Thank you for your consideration of this matter

Sincerely,

Petersburg Borough Planning Commission

Chris Fry

Richard Burke

Yancey Nilsen

David Kensinger

Tom Stearns

Otis Marsh