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First name: Robert

Last name: Claus

Organization:

Title:

Official Representative/Member Indicator:

Address1: PO Box 986

Address2: 609 Third Street

City: Craig

State: AK

Province/Region:

Zip/Postal Code: 99921

Country: United States

Email: rclaus@aptalaska.net

Phone: 907 826 3004

Comments:

I am a long term resident of Prince of Wales island, and have participated at some level in many of the planning processes undertaken by the Forest Service over the last decade or so. Most recently, I was a participant in and commenter on the Landscape Level Assessment. I received the draft outline of the POWLAA with some interest. In general, the specificity of recreation infrastructure improvement suggestions are refreshing to see at this point in the planning process, and I hope these projects continue to receive institutional support as time goes on.

The issue statements do not reflect my understanding of the issues facing the Forest Service as it continues to develop a project or series of projects of this magnitude and time scale.

Issue Statement 1, invasives, underestimates the public antipathy towards herbicide use on POW. This issue unites people from across the political spectrum in opposition to the wide use of herbicides. Historical opposition to spraying herbicides to manage forests on Corporation land or alongside State roads has been strong and broadly based, and this public opinion, clearly and consistently stated, should be prioritized over the economics of various methods of control.

Issue Statement 2, subsistence, does not address cumulative impacts of non-Forest Service managed lands adjacent to Forest Service land. This is a fatal flaw in the planning process that is illustrated by the Commercial Harvest mapping, showing potential future logging in east-west corridors that have already been constricted by logging and road building on private holdings or State land, appropriately marked in black on the draft maps. These parcels, not subject to Federal guidelines for logging or habitat protection, must be considered at this "landscape" level of analysis. The overall impact of industrial activity on wildlife habitat is not limited to that activity on Forest lands, and the cumulative impact analysis should not be limited in this way either.

Issue Statement 3 expresses a need for timber volume to contribute to the local economy, and says in part that "operators need economical timber to stay in business and loss of those operators would have an adverse impact on local economies." Economical timber really means taxpayer subsidized timber, as the current operators are unwilling to pay the market rate for timber from the private landholders on the Island when cheaper timber is supplied as a matter of policy by the Forest Service.

Second, the volume of timber required is a matter of assertion by the operators, is not based on evidence provided by the operators or another source, is not based on independent economic analysis, and appears to change from time to time depending on the whim of those making the estimates. These figures cannot be used as a basis for rational planning.

Finally, and most importantly, timber and its ancillary operations are a very small part of the Southeast Alaska economy, and one that, if allowed to proceed unchecked, precludes other more stable and permanent economic activities. Permanently denuding the Forest of old growth to preserve 40 jobs for a few years is not proper stewardship, and is economically short-sighted.

The discussion of alternatives raises questions that may or may not be answered in the continuing process. The preferred alternative appears to be an odd mix and match of competing priorities, and the other alternatives do not rectify the confusion. The no action alternative, as always, gets short shrift and appears in

even this early stage to not be seriously analyzed or considered, but is the alternative that is most clearly distinguished from the others.

The preferred alternative contains very optimistic numbers for timber harvest that are not supported by evidence. The genesis of these numbers in the POWLAT meetings was suspect, based on unsupported assertions from industry representatives, and then modified in the interest of conciliation with other interests. These harvest goals are not supported by evidence of demand other than rough estimates of mill capacity, and not supported by evidence of availability of trees on Forest Service managed lands. Industry representatives maintain that projections of available young growth are exaggerated, and experience shows that projections of old growth in any given project area are consistently overestimated. Thus, these harvest targets and timelines are unreasonable. At the least, the writing of the DEIS should be delayed until the POW inventory process is completed, published, and reviewed.

Alternative 3 appears to include a more robust deer habitat strategy than Alternative 2, and I would be interested in seeing that folded into the final version of the plan.

I disagree with the decommissioning of the Harris River campground in favor of more remote sites. The campground is a keystone of the Hollis to Craig route, providing a convenient midpoint destination for a hiker or biker traveling from the ferry to the west side of the island. There is enthusiasm and interest statewide in longer trail systems with a variety of available services, and the Hollis River trail system including a campground seems like one the Forest Service should support.

The road building contemplated in the preferred alternative seems to be excessive. 90 miles of new system road and 250 miles of temporary road is hugely expensive, and antithetical to the wildlife habitat goals of the Forest Service. The Forest Service needs to inform the public about who is going to pay for these roads - the purchaser or the U.S. taxpayer.

Appendix A outlines a young growth management system, or recommendation, for 100 years of treatments. While I generally agree with the idea that these parcels should be managed to maximize deer habitat, the Forest Service cannot use a 10 or 15-year plan to set a strategy for the next 100 years. Planners cannot have it both ways, suggesting that the solutions to short-term disruptions to the ecosystem will be solved by long-term actions, but then claim they are unable to accurately predict the longer term implications of their immediate actions.

If we are indeed contemplating a 100 year planning cycle (and my admittedly unreasonable preference would be to use the lifespans of our longest lived species, about 500 years), climate change will have to be considered much more seriously than it has been to date in Forest Service's planning processes. There have been demonstrated changes in species composition, precipitation amounts and types, temperature, and weather patterns in Southeast Alaska over the last several decades and these changes can be expected to continue in unpredictable ways over the next 100 or 500 years. Planning forestry activities for a century into the future seems a fool's errand, and well outside the scope of this analysis.

I argue that the degree of economic, political, and environmental uncertainty involved in thinking about the Forest over time urges a conservative approach, with minimal disruption to existing natural systems being the primary goal and taking precedence over short-term and temporary economic benefits, even if they can be shown to exist.