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Comments:

Please accept these comments on the Out-year Plan for the Prince of Wales Landscape Level Analysis Project.

I am a long term resident of Craig, Alaska, who uses the Forest on Prince of Wales and surrounding islands regularly. I am a retired Alaska State Trooper who patrolled the road systems and small villages and logging camps of Prince of Wales Island from 1994-2008, and have since participated in non-consumptive uses of the Forest such as hiking, boating, photography, and wildlife viewing on an almost daily basis in designated recreation areas and all other designated land use zones. I participate in subsistence activities on the Forest involving fishing and foraging. I have closely observed the impacts of past and current logging practices on the Forest from the perspective of a law enforcement officer noticing the social impacts of economic policies; a recreational user noticing the ebb and flow of recreational opportunity as related to industrial activity on the Forest; and a community leader as an elected member of the Craig City School Board. I have led group activities on the Forest through an informal outdoors activities program known as "Out in the Rain" that introduced people to new experiences that involve outdoors physical activity and education, with an emphasis on outreach to youth and young adults. I have participated in policy discussions and decision making about Tongass issues as a former staff member of the Southeast Alaska Conservation Council and as a private citizen, submitting numerous comment letters and offering public testimony on Forest issues in various formats up to and including testimony before the US Senate and House of Representatives. Most recently, I participated in the Prince of Wales Landscape Assessment Team process as a member of the public, with emphasis on recreational opportunities on Prince of Wales Island. I did not concur with all of the recommendations of that group. I submitted comments during the EIS process, and some of my critiques were not addressed in the decision documents to any degree of satisfaction and I believe they are still pertinent.

As a non-professional with limited time to review this Out-year plan, approaching 700 pages of text with detailed maps that are hard to understand without GIS training, and a very short comment period, I found this collection of working documents inadequate to the purpose of informing the public as to the Forest Service's intentions, especially for the commercial timber harvest proposals. The inadequacy of the provided materials led to an inability to do any of the investigation that would be possible given a more coherent document and a longer comment period.

There is no plan presented here. This collection of maps, charts, and unit cards in no way forms a coherent "plan" in any commonly understood sense of the term. There is no indication of who will do what where or when, or how any of these activities might be funded. There is no mention of the contracting method to be employed, whether a traditional timber sale or an integrated contract that would include the restoration and recreation components of the proposal. There is no information provided that would allow a reader to determine how the Forest Service will prioritize the hundreds of logging units specified, although the recreation and restoration aspects of the project appear to be at least selected for the next three fiscal years. The lack of specificity in the working papers provided is reflected in the lack of specificity in the comments below.

I believe that the long term mission of the Forest Service demands that carbon sequestration for forest health be prioritized over short term economics. Standing old growth forest is an important world resource, not just

from an esthetic perspective or a habitat perspective, but from a carbon storage perspective, and should not be included as a piece of this plan.

This plan proposes an unconscionable level of logging. USFS officials in public meetings have suggested it contains 50 mmbf, not specifying amounts of old growth or young growth or the time period in which that 50 mmbf are to be logged. Current industry is incapable of absorbing this amount of timber. As an example, there are out of state log trucks working on Prince of Wales today to service ongoing operations. There is no surplus of loggers, laborers, or truckers, logging equipment or trucks, or the support facilities needed to feed and house them on Prince of Wales. These would have to be imported or built from scratch to support this level of logging at great social and economic cost to the communities on the Island.

Industry representatives have consistently stated that they cannot harvest and process young growth profitably, and will rely on old growth as long as the Forest Service makes it available. I believe industry will bid only on old growth for the foreseeable future.

Old growth forest is a finite, rare, and valuable resource that belongs to all Americans and should be passed on to future generations, not destroyed now for short term profit that benefits only a few. I don't accept the premise that old-growth harvest is required for community economic health. No evidence has been presented to support the assertion that old growth harvest from National Forest Service land is needed to support local communities. I believe it is unwise to revisit the industry-centered economy of the 1980s and 90s and the social and environmental disruption that it brought to the communities of Prince of Wales Island.

Old growth is too valuable to log, and industry cannot make a profit without logging old growth. It is time for the Forest Service to discontinue promotion of logging of old growth and support of this antiquated industry, starting with this project and with every unit in it that is designated for old growth harvest.

I recently commented on the Draft EIS that preceded this project: "I am concerned about the lack of geographic specificity in the proposed actions. Each of the alternatives appears to be a cafeteria-style range of options spread out over non-specified locations. As a participant in many past environmental analyses, I do not understand how a manager can take the required good hard look to professional standards when the area to be impacted has not been identified in specificity. Reference to the activity cards in the text of the DEIS would seem to promise more specificity, but they are punishingly vague boilerplate as well."

The vagueness remains in the maps and unit cards in the current collection of documents. Over 200 units are proposed, but there is no information provided about which units are to be prioritized or scheduled in which order. It is clear that not all of these units can be logged in 2019, if ever, even if the required technical surveys can be completed in a timely fashion given agency resources. There is no mention of commercial timber harvest in FY 2020 and 2021 in the chart of activities called the Out-year Plan. If there is a timeline or "plan" of what is proposed to be done when, it is not apparent in the documents provided.

One could speculate that the old growth closest to existing road systems and most economically loggable would be cut first, creating one set of environmental problems, or that other silvicultural concerns like species mix would call for more helicopter logging which would create a whole different set of environmental concerns. Neither of these possibilities or the many other combinations possible in this project area have been addressed.

Prince of Wales Island is a big place with varied terrain, vegetation, and animal life. Logging in one place can create vastly different concerns than logging in another. Considerable scientific effort has been made over time to identify wildlife migration corridors, high quality habitat, water flow, karst resources and other important resources, and it does not appear that this information was applied in any organized way to this proposal.

Unofficially, the process of public input through the POWLAT was described as a way to shortcut or streamline NEPA analysis ("Do all the NEPA at once, and then decide"). I do not believe it is reasonable to shortcut NEPA analysis by neglecting to specify the location or timing of major activity. I do believe that the Forest Service is duty bound to do the analysis first, then make a reasoned and scientifically justified project proposal presented in a coherent way to the interested public.

The unit cards are egregiously vague, or as they say in school, not done yet. They do not provide the specific information that any reasonable person would require to understand the impact of the project.

An example card, Unit 6, is typical. VCU unit numbers are provided, and a spur road is numbered on the pocket map, but even the informed observer is left in the dark as to where this is. The VCU numbers and USFS road numbering system are not commonly understood geographic information, such as latitude and longitude, road names or even community names. A GIS specialist was able to label and locate this unit, but it was not apparent from the materials provided.

Unit 6 Silvicultural "Surveys have not been completed. All resource-specific information, protections and mitigations will be determined before harvest activities are implemented." This is not enough information to provide the basis of an informed comment, much less a commercial harvest plan. Do the surveys first, then ask for comments and formulate a plan.

The controlling language about how old growth will be handled is presented as an option-we will do it this way or we will do it that way. This is not good enough. Determine, for each unit, how the agency intends to deal with old-growth habitat based on the existing guidelines before proposing harvest activities.

Unit 6 does specify that it is a ground based shovel logging system, a remarkable level of specificity for this document, but then proposes a temporary road of 400 feet that involves a stream crossing, again with "Surveys have not been completed.." language, which is repeated for scenery and recreation. I have no particular scenery or recreation concerns for this unit, but the short comment period and lack of understandable geographic information makes it impractical to form an opinion on each of the proposed units.

This unit was selected as a typical example, and a quick scan shows many of the hundreds of units are similarly incomplete and vague. "Surveys have not been completed." is not an adequate basis to push forward with disruptive and destructive activities on the Forest.

The maps in the plan paint an even more unacceptable picture, of a logging mobilization on first one major section of the Island and then moving on to the next, leaving disrupted fish and wildlife habitat and subsistence opportunity behind. The old practice of developing camps to intensively log an area before moving on to the next is suggested by the clustering of units. There is no information provided to suggest which of these clusters-North POW? Naukati? Stoney Creek? Polk Inlet? Kosiusko?-will be first to be logged and which the last. This is essential information for one to make an informed judgement or comment about the plan as a whole, and it is not provided.

There is no information provided about the location or composition of the camps that will be needed to log these remote units. History shows us that temporary logging camps are environmental disasters, with documented and highly visible poor handling of hazardous waste, human sewage, and household and industrial shop garbage. The camps are notable as well for the local over-harvest and poaching of fish and wildlife caused by an influx of workers with no sense of responsibility to local resources. Each camp site should require an extensive environmental review, impossible if the sites are not identified. The requirement for these camps ought to give community leaders pause about the purported economic benefit to local towns. If out of state workers occupy temporary camps near remote worksites, what benefits do they bring to local economies?

This proposal, rather than representing a positive step forward in community involvement, is a throwback to the agency and industry-driven policymaking of the past. Industry makes up a target that they would like to harvest and the Forest Service tries to meet that number, focusing logging effort on the best of what's left after over a century of timber-centric management. The idea that Prince of Wales Island is a sacrificial island for the agency to develop as it sees fit, without adequate public input or oversight is an old one, dating to before statehood, and should form no part of modern decision making.

I personally feel ashamed for allowing myself to be a part of the POWLAT discussions, fooling myself into thinking that the detailed discussions about recreation and restoration proposals marked a change in agency direction. I recall being concerned during the discussions about the lack of detail and specificity in the timber proposals, and being mollified by the assurances of the Forest Service staff that the work was being done, and that it would be presented in a comprehensible format at a future date before the decision and implementation of such a big project for our island.

With the current set of inadequate documents described as the Out-year Plan, my concerns are proven to be well-founded. The rushed and incomplete work done to date is in no way sufficient to support the level of activity contemplated.

Thank you for your attention to these comments.

Bob Claus
Craig, Alaska