

The Tongass Transition Framework:

A Plan for Looking at the Tongass National Forest with its Trees

Background:

In May of 2010, the Secretary of the United States Department of Agriculture Tom Vilsack sent a letter to the now-defunct Tongass Futures Roundtable, an organization that existed to negotiate forest conflicts, calling for a “transitioning quickly away from timber harvesting in roadless areas and old-growth forests” through the development of a “transition framework” for the Tongass National Forest in southeast Alaska. The program would help communities and the U.S. Forest Service move from an old-growth timber-based economy to a more diversified economy providing jobs in renewable energy, forest restoration, second growth timber, tourism, subsistence, fisheries and mariculture industries. Alaska Wilderness League supports the principles of the transition framework; however, we are disappointed that three years later the Forest Service has yet to take any real action to implement the transition plan.



A view of the trees of the Tongass National Forest. Tongass trees can grow to be 1000 years old, 100 feet high and 12 feet in diameter.

The New Economy of the Tongass, America’s Rainforest:



A cruise ship pulls into port in Juneau, AK. 90 percent of southeast Alaska’s visitors travel by cruise ship.

For decades, the economic value of the Tongass was measured in board feet. Under the Alaska National Interest Lands Conservation Act, Section 705(a), Congress provided up to \$40 million annually, without appropriation, to support the cutting of up to 450 million board feet (MMBF) of Tongass timber per year. Huge federal subsidies were thrown into the construction of two massive pulp mills in the towns of Ketchikan and Sitka that devoured hundreds of MMBF annually. Milling and logging operations were the major employers in the region, providing jobs to 2,000 southeast Alaskans until the 1990s, when both the mills shut their doors due to Clean Water Act violations. Although the economy was hard hit at first, it rapidly transitioned from a resource extraction based economy to one dependent on the conservation of forest resources.

In 2013, the majority of southeast Alaskans still trace their livelihoods back to the trees, not for their timber value, but for the healthy watersheds that support jobs and strong fish populations. Tourism and fishing are the two largest industries in the Tongass, each contributing about a billion dollars annually to the region’s economy. One million people come to the Tongass annually to see the only mostly-intact temperate rainforest in America, which supports 10,000 tourism jobs. The Tongass’ 5,500 salmon rivers and streams have provided for the largest salmon catch in the state two summers in a row; commercial salmon fishing in the Tongass provides for an additional 7,300 jobs. In contrast, the timber industry in southeast is on life support requiring \$23 million in annual subsidies to support little more than 100 direct timber-related jobs.

A severe budget discrepancy exists between the well-subsidized timber industry and today’s economy based on tourism and fishing. For example, guides and outfitters in the Tongass are unable to get the permits they need to operate because the permit office is



Kirk Hardcastle of Taku River Reds. Taku River Reds is family owned and operated direct-to-marketing fishing company based in Juneau.

underfunded and understaffed. There is a \$100 million backlog in unmet watershed restoration needs, with most of the damage caused by previous logging which at current funding levels it will take another 50 years to address. The transition presents an opportunity to fix this budget discrepancy and appropriate the Tongass' federal funding to reflect and support the growing industries that supply jobs to southeast Alaskans and bring in taxpayer dollars.

The Argument for Transitioning out of Old-growth Logging:

More than 98 percent of the old-growth in the Lower 48 has been cut. More than half of the old-growth giants in the Tongass have been logged, but we can protect the ones that are left. If the U.S. Forest Service continues cutting old-growth reserves in the Tongass, it will have an increasingly significant impact on fish and wildlife habitat, further increasing the need for watershed-scale restoration, and strengthening the need for species listings pursuant to the Endangered Species Act. Old-growth logging hurts the tourism and fishing industries, the environment of southeast Alaska, and costs America's taxpayers \$200,000 in subsidies for every timber job. It is past time for the Forest Service to see the Tongass for its true value and transition out of large-scale old-growth logging in the Tongass and into sustainable industries like fishing, recreation and tourism.

Transition Timeline:

- * **May 2010: Secretary Vilsack announces the transition framework** to move the Tongass out of old-growth logging and into renewable energy, forest restoration, second growth timber, tourism, subsistence, fisheries and mariculture. The idea of changing the way the Tongass had been managed since statehood was met with accolades from the environmental community.
- * **October 2012: Tongass National Forest Supervisor Forrest Cole (Cole) announces he will review the Tongass Land Management Plan (TLMP).** TLMP is the blueprint for management of the Tongass National Forest. The National Forest Management Act (NFMA) and its ensuing 1983 regulations require that every national forest has a forest plan. This plan must be revised every 15 years, with a potential review every five years at which point the plan could also be amended or revised if the circumstances on the ground or the demands of the public warrant it. TLMP was last revised in 2008.
 - * If the transition is to be given any lasting power it needs to be included in TLMP.
 - * Cole called for a public comment period on the 5-year plan to identify what parts of TLMP are working and what needs to be changed.
- * **January 2013: Leaders Intent Document Released.** "Leaders Intent: Forest Stewardship and Young Growth Management on the Tongass National Forest" was released by Regional Forester Beth Pendleton and Tongass Forest Supervisor Forest Cole. In the document, Pendleton and Cole committed to the following over the next 10 years:
 - * **Strategy:** Developing a strategy to transition out of old-growth to second growth;
 - * **Economics:** Creating a business-friendly program of work, provide a dependable timber supply, support small mills, increase use of stewardship contracts, increase wood to energy opportunities;
 - * **Diversity:** Providing more integrated projects that involve multiple resource opportunities and provide for diverse employment opportunities, collaborate with diverse stakeholders; and,
 - * **Transition:** Selling more young-growth and less old-growth over time.
 - * **Too Little, too Late:** The Leaders Intent Document was little more than rhetoric on the transition, providing no clear path for the Forest Service to follow.
- * **January 2013: the 5-year vegetation management plan and the Leader's "Trajectory to Young Growth on the Tongass National Forest" are released.** The document lays out a 30-40 year transition and a vegetation management plan that would dramatically increase timber sales in the

Tongass from 135 million board feet (MMBF) over a five year period to 690 MMBF (including the 130 MMBF currently under contract this would total 810 MMBF being cut in the next five years, a 25- year supply of old-growth).

- * **Too Light on the Second-growth:** The plan only offers 50 MMBF of second-growth or approximately 7 percent of the old-growth timber being offered. It's all too clear that the Region 10 office of the Forest Service is in no hurry to transition to a second-growth economy.
- * **June 18, 2013: The Sealaska Bill S.340 Passes out of the Committee with Cumulative Mean Annual Increment (CMAI) Language:** The Forest Service states that they must be able to cut trees younger than is currently allowed under NFMA if the transition is to have enough second-growth timber to move forward. Legally USFS cannot cut a tree until it reaches CMAI – the point at which a tree's growth rate slows and it is considered mature. In the slow growing conditions in the Tongass, the CMAI tends to be reached at 70-100 years. The Sealaska language would allow the Forest Service to relax CMAI on 50,000 acres over a 20-year period. The administration does not need legislation in order to adjust CMAI, since they can pursue this through an amendment to TLMP.
- * **June 30, 2013: Public Comment Period on TLMP Closes.** 175,000 public comments were submitted from the conservation community asking the secretary to amend TLMP to include the transition framework, and move towards a more diversified economy in southeast Alaska.
- * **July 1, 2013: Big Thorne Timber Sale Announced:** Tongass Forest Supervisor Forrest Cole released the Final Environmental Impact Statement and Record of Decision on the first timber sale on the 5-year vegetation management schedule, Big Thorne. This behemoth sale of 148.9 MMBF is the largest sale in the entire national forest system for more than two decades. 116 MMBF of Big Thorne is old-growth and 15 MMBF is second growth, the remaining is scrap. 8,500 acres of timber will be impacted; 6,200 acres are old-growth of which 3,800 will be clear-cut. There was be a final appeal period for 45 days ending August 19 and a 45-day review period to follow. The sale has since been postponed.
- * **July 3, 2013: "Secretary's Memorandum 1044-009 Addressing Sustainable Forestry in Southeast Alaska" is released.** In the memorandum from Agriculture Secretary Vilsack to Forest Service staff, he provides guidance on moving forward on the transition and sets a series of benchmarks for staff to meet.
 - * **Timeline:** Calls for a 10-15 year transition period.
 - July 30, 2013: Requests scenarios to speed the transition.
 - September 30, 2013: Calls for a decision on whether or not to move forward with a TLMP amendment.
 - December 30, 2013: Asks that a plan for funding retooling be developed.
 - * **Old-growth:** Calls for significant "bridge timber" to help fuel the transition to second-growth starting with Big Thorne and a series of old-growth timber sales. Asks the agency to focus on financially supporting the retooling of existing mills. The amendment would be focused on changing Land Use Designations (LUDs are units of land with specific management policies) to make more timber eligible to be cut.
 - * **Too Heavy on the Timber:** Instead of a comprehensive plan for the transition that includes tourism, fishing and sustainable industries, the Secretary's memo only focuses on timber and increasing old-growth sales.
- * **September 30, 2013: Regional Forester Beth Pendleton delays the Big Thorne.** In response to concerns about the sales impact to wolf and deer populations in the area raised by biologist David Pearson, Regional Forester Pendleton delayed the Big Thorne timber sale and called in the Wolf Task

Force to investigate the it. Unfortunately, the Wolf Task Force is a little used and unregulated body that cannot be trusted to use the best science available to make their decision.

- * **October 1, 2013: Deputy Regional Forester Tricia O'Connor issues a press release entitled “U.S. Forest Service announces intent to modify the Tongass National Forest management plan to advance transition, support forest industry.”** In the release she says that they are going to amend the TLMP but do not say how or to what scale or scope it would be changed.

A Real Transition in the Tongass:

The Forest Service has taken some small steps in the right direction, however, to rapidly achieve a sustainable transition they will need to:

- * **Amend the Tongass Land Management Plan to Include the Transition:** The Forest Service has announced that it will amend the land management plan but has not revealed how. It should be a very narrow amendment that will address only the phase out of old-growth logging. The best way to do this would be an adjustment to the Annual Sale Quantity (ASQ, the maximum amount of timber that can be sold annually). Currently the average consumption of old-growth is 27 MMBF, which should be reduced by modifying the ASQ over a 5- to 10-year period in order to provide enough old-growth to keep the small, artisanal mills operating.
- * **Adjust the Tongass Budget to Support the Economy:** The Forest Service must gradually reallocate one-third of its current timber program expenditures to watershed restoration and visitor services to continue to stimulate the job market and create sustainable economic growth in southeast Alaska.
- * **Maintain or Increase Existing Funding for the Transition.** The Forest Service should maintain and add to existing funding for restoration of forest lands, vegetation and watershed management and wildlife and fisheries habitat management in order to sustain the region’s true economic drivers—fishing, tourism and recreation.
- * **Invest in sustainable second-growth management.** The Forest Service should encourage sustainable second-growth forest management, promote small business and economic diversification, and transition from old-growth logging. It can accomplish this by establishing new timber targets, creating new collaborative community forestry projects and establishing a rural economic development fund.
- * **Implement Land Use Designations to promote the Transition.** The Forest Service should administratively protect the Tongass 77 watersheds. Scientists have identified 77 watersheds that are the most productive salmon and trout habitat in the forest. Areas with high fish values tend to be the best tourism locations as their rich ecosystems also support bears, bald eagles and other Tongass wildlife as well as flora and fauna that tourists come to see. These watersheds should be prioritized for their fish production and tourism values and should be protected appropriately.
- * **Strengthen Existing Protections in the Conservation Strategy.** The Forest Service should strengthen and expand the protections of the Conservation Strategy. For 16 years, this policy has protected a network of old-growth reserves and wildlife corridors that have maintained viable populations of a number of fish and wildlife species. Despite these protections, species like the Alexander Archipelago wolf and Queen Charlotte goshawk are still headed towards the endangered species list.
- * **Implement the Roadless Rule.** The Forest Service should formally remove inventoried roadless areas from the timber base consistent with the 2010 announcement and the Roadless Area Conservation Rule.

If you have questions on the Transition or other Tongass related matters please contact the League’s Rainforest Program Director at (202)544-5205, or go online to www.alaskawild.org