

The Tongass National Forest

No hype, just the basic Facts

Timber Base and Annual Harvest

• At 17 million acres, the Tongass National Forest in Southeast Alaska is the nation's largest, home of 75,000 Alaskans who rely on it for jobs, fishing, hunting, subsistence, tourism, timber and recreation.

• 10 million acres of the Tongass is forested, 5.4 million acres contains commercial quality timber.

• Federal policies and law restrict the areas that can be harvested for timber production to 1.7 million acres of the Tongass. That is 10 percent of the total land area of the forest or 31 percent of the commercial timber lands.

• 6.6 million acres of the Tongass have been designated Wilderness, an area prohibiting not only timber harvesting, but all development. An additional 4.1 million acres of the of the Tongass are in Forest Service land use zones prohibiting logging, leaving 63 percent of the forest off limits to harvesting.

- Average annual timber harvest: 10,000 acres
- Harvest rotation: 100 years
- Allowable harvest ceiling: 17,000 acres (which does not occur)
- Since 1954, 340,000 acres of trees have been harvested in the Tongass National Forest. That's less than 2 percent of the Tongass or 17 percent of the area specifically allocated for logging.
- Under the current management plan, two-thirds of the old-growth acreage in the Tongass will never be touched by logging.

Sustainable timber harvests

• With appropriate silviculture practice, the 1.7 million acres available for timber harvest in the Tongass is capable of sustainably producing 556 million board feet annually over a 100-year rotation, 642 million board feet annually over a 90-year rotation, or 776 million board feet annually over an 80-year rotation.

• The average annual harvest in the Tongass National Forest is 302 million board feet, a level well within sustainable capacity of the forest. The current land management plan allows a total harvest of 420 million board feet per year.

Fish and Wildlife

• The vast preponderance of historic habitat remains for virtually all species. There are no species that are facing a "short-term" viability crisis. Approximately 58 percent of the species that biologist consider old growth dependent reside in areas where logging is not allowed.

This back page is reserved for our monthly newsletter sponsor. This month's sponsor, Southeast Stevedoring, donated the space to provide readers with additional facts on the Tongass.

Resource Development Council
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Anchorage, AK 99503

ADDRESS CORRECTION REQUESTED

Products from Tongass Timber

• Timber from the Tongass National Forest is manufactured into dimensional lumber, window and door cut stock, decking, lumber, boats and boat repair, paneling, fencing, roof shingles and chips for paper. It is also manufactured into dissolving pulp which is a component of textiles, fabric garments, upholstery, curtains, carpeting, industrial belting, hosing, tires, cellophane/packing, sponges, sausage casing, artificial kidneys, nonwoven disposable protective clothing, encapsulate electronic equipment, high speed printing inks, piano sounding boards, guitars, lacquers, paints, coatings, pills, chaplets, dietary bakery goods, emulsifiers, low calorie ice cream, cosmetics, cellophane (biodegradable wrap), toothpaste, formica, artificial leathers, molded luggage, laminates, tissue, photo film and artificial vanilla.

Timber Employment

• The timber industry in Southeast Alaska generates \$43.3 million annually in payroll and accounts for 38 percent of the total employment in the region. Support sector payrolls contribute \$15 million annually. Since the passage of the Tongass Timber Reform Act of 1990, direct timber employment has fallen by 40% or 1,700 jobs.

Beetle Infestation ... (Continued from page 3)

rates by the worst polluters in the entire Pacific Northwest.

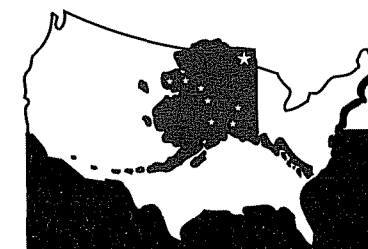
Absent from the mailer was the fact that logging is occurring in areas heavily infested by the spruce bark beetle and that the infestation is transforming Kenai Peninsula viewsheds into graveyards of brown dead or dying trees.

Foresters concede logging cannot stop the infestation, but emphasize that a combined program of harvesting and reforestation can restore forest health much faster than if no action is taken.

Forest scientists explain that new harvesting programs utilizing modern forest management initiatives to protect wildlife and fisheries is a reforestation program that will lead to a young, healthy and vigorous-growing forest. Since most of Southcentral Alaska is now a fire suppression area, they say logging would take out the dead trees, as opposed to nature's way — fire. If no logging is allowed, many timber stands on the Kenai may revert to grasslands.

With its varied patterns of land ownership, the Kenai Peninsula is a great ecological, long-term experiment in forest management. While extensive logging is occurring near Homer on State and private land, very little cutting is taking place on the much larger expanses of the Peninsula. Only a fraction of the beetle infested spruce will be cut on the Chugach while no commercial logging will occur on the Kenai National Wildlife Refuge and Kenai Fjords National Park. Foresters will be watching the different rates of regrowth, comparing areas actively managed for logging and reforestation with those forests left to stand as gray ghosts.

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Final battle in the Tongass?

New TLMP proposal would upset balance, harm economy

The Southeast Alaska forest products industry is fighting for its life after the U.S. Forest Service unveiled its preferred alternative in the long-awaited revision of the Tongass Land Management Plan (TLMP).

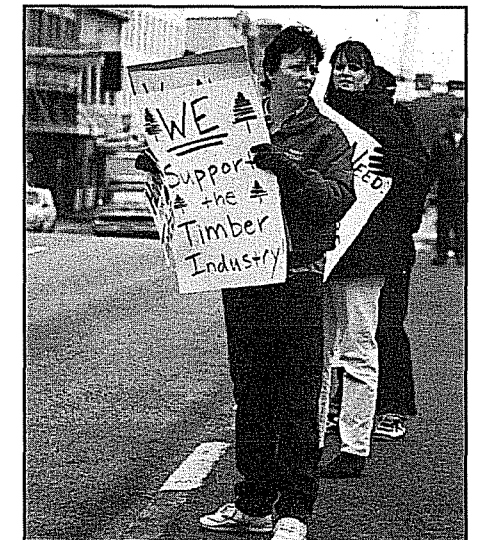
The preferred alternative would reduce the land base available for timber harvest by 30 percent and shrink the annual harvest ceiling from 450 million board feet (mmbf) to 297 mmbf. Industry and local community officials fear the reductions could deliver a lethal blow to the Southeast Alaska forest products industry, prevent the reopening of Southeast Alaska mills and severely damage local economies dependent on timber harvesting.

"If this plan is adopted, it will hurt Ketchikan Pulp Company, our workers and the communities of Southeast Alaska," said Ralph Lewis, President of Ketchikan Pulp. "This plan is a total violation of the compromise Tongass Timber Reform Act of 1990 that Alaskans worked so hard to achieve."

The 1990 reform act left 63 percent of the Tongass permanently closed to logging, as well as 58 percent of the forest's old-growth trees. Only 9 percent of the forest's old-growth trees have been harvested. In exchange, the compromise provided industry a 1.7 million acre timber base, as well as an allowable annual harvest ceiling of 420 mmbf on a 100-year sustainable rotation cycle. The new plan, however,

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- Ralph Lewis
President
Ketchikan Pulp Company



In recent hearings across Southeast, Alaskans came in large numbers to speak out against the Forest Service's Preferred Alternative in the recently-released Tongass Land Management Plan. Above, Ketchikan residents express support for the timber industry. (Photo: Alaska Forest Association)

shrinks the available land base to 1.2 million acres and slashes the annual harvest levels, which many Southeast Alaskans believe will have disastrous consequences on the economy. Industry officials warn that the lower harvest target does not free up enough wood to satisfy the KPC long-term timber supply contract and still make trees available for smaller operators.

TLMP outlines land and resource management planning over the next decade for the nation's largest national forest.

"If this plan is implemented without serious modifications, the Alaska timber industry and many of our Southeast Alaska communities will shrivel," predicted Jack Phelps, Executive (Continued to page 4)

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RDC elects new officers, board

Scott Thorson to serve as President

Scott Thorson, President and owner of Network Business Systems, a sales and services organization specializing in Novell and Microsoft computer networks, has been elected President of the Resource Development Council. Thorson was elected to the one-year term at RDC's 22nd Annual Meeting of its Statewide Board of Directors June 5 in Anchorage.

Allen Bingham, Partner at Deloitte & Touche, was elected Senior Vice President while John Sturgeon, President of Koncor Forest Products was re-elected Vice President. Re-elected to the office of Secretary was Jerry Booth, Vice President of Energy and Minerals at Cook Inlet Region, Inc. Mike Stone, Managing Partner at KMPG Peat Marwick, was elected Treasurer.



RDC Board members pause for a photo opportunity at the Sheraton Anchorage Hotel.

A resident of Anchorage since 1973, Thorson worked more than 10 years in the aviation field in positions ranging from cargo loader for Northern Air Cargo to pilot for Reeve Aleutian Airways.

In 1986, Thorson began a three-year stint as a financial consultant for Merrill Lynch, before joining the business staff of Northern Air Cargo as Marketing Manager.

Thorson opened his own business, Network Business Systems, in January 1994. The company is a service provider to design, implement, upgrade



RDC President Scott Thorson honors Past President Elizabeth Rensch for her dedication and work on RDC issues.

and maintain networks, as well as make connections with other computer systems and the Internet.

Elizabeth Rensch, RDC's immediate Past President, will remain active on the RDC Executive Committee. Rensch is President and owner of Analytica Alaska, Inc., an environmental testing laboratory based in Anchorage.

Newly elected to the RDC Executive Committee were Jim Branch, Anchorage and Thyes Shaub, Juneau.

Newly elected to the Statewide Board of Directors were Jeff Cook, North Pole; John Donohue, Anchorage; John Key, Kotzebue; Michael O'Connor, Anchorage; Mayor John Stein, Wasilla; David Walter, Anchorage and Eric Yould, Anchorage.



RDC Board members gather for the annual business meeting and election of new officers.

The Resource Development Council (RDC) is Alaska's largest privately funded nonprofit economic development organization working to develop Alaska's natural resources in an orderly manner and to create a broad-based, diversified economy while protecting and enhancing the environment.

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 Sr. Vice President Allen Bingham
 Vice President John Sturgeon
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 Past President Elizabeth Rensch

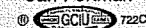
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Writer & Editor
 Carl Portman



Guest Opinion

by Jack Phelps, Executive Director, Alaska Forest Association

Proposed TLMP: No science, bad policy

It came as no surprise that the Forest Service's Preferred Alternative for the new Tongass Land Management Plan (TLMP) would crank the screws down tighter on logging in the Tongass. The proposal would reduce the available land base by adding 500,000 acres to existing no-cut zones in the form of Habitat Conservation Areas. It also withdraws more land for fish habitat protection by increasing buffers along anadromous fish streams. Bottom line, the plan will shrink the available land base to 1.2 million acres, and slash the Allowable Sale Quantity (ASQ) from 420 mmbf to 244 mmbf (net sawlog, using an 18% conversion factor.)

Needless to say, such a large reduction in the ASQ will have disastrous consequences for the timber industry. In releasing the new figures, the Forest Service made the point that a 297 mmbf ASQ (sawlog plus utility) was sufficient to supply the Ketchikan Pulp Company's long term contract and still provide 100 mmbf for the independent sale program. This is a litany you can expect to hear repeated in the media over the next few months. Unfortunately, the Forest Service has been unable to consistently deliver 70 percent of its stated goal, and we have every reason to believe that level of performance will continue. Realistically, we can expect only about 200 mmbf to come out of the Tongass under the new plan -- and remember, this is sawlog plus utility.

It is plain to see where such a minuscule level of offerings would put the industry because there will not be enough wood to satisfy the KPC contract and still make trees available for the SBA program. A divide and conquer scenario would develop: Long-term contract obligations would become the excuse for failing to provide sufficient timber for the small operators, or conversely a serious shortfall in long-term

Implementation of TLMP must be delayed, the plan carefully scrutinized and largely rewritten, and the Forest Service put back in the timber supply business.

sale offerings would be blamed on the need to provide sales for the SBA program. Such shenanigans are really unnecessary, since the Tongass is fully capable of satisfying the needs of both programs with volume left over to wood other mills, including operations in Wrangell and Sitka.

In fact, in 1993 the Forest Service agreed with that assessment when it produced, selected and justified a TLMP revision designed to keep the jobs promises of the Tongass Timber Reform Act (TTRA). The now-famous Alternative P proposed an ASQ of 420 (net sawlog) and took a realistic look at the Anadromous Fish Habitat Assessment (AFHA) recommendations regarding stream buffers. The conclusion then was that only the lower levels of recommended protection were justified by the science.

The new plan, with no new evidence to support the change, recommends an increase in buffer standards on so-called high-value streams. This recommendation comes despite a recent report published by the National Oceanic and Atmospheric Administration (NOAA) which indicates that the present level of salmon habitat protection in Alaska is adequate. The author of that study, Michael L. Murphy, is a well-recognized expert in fisheries research whose studies and published papers have strongly influenced habitat protection measures in Alaska and the Pacific Northwest.

Similarly, the new plan imposes a wildlife protection strategy on the Tongass without any scientific study to

verify that it is an appropriate model for this particular forest. Habitat Conservation Areas were developed as a protection strategy for some islands in the South Pacific and superimposed on the forests of the Pacific Northwest by Jack Ward Thomas, without adequate study. Now that Thomas is Chief of the Forest Service, he is determined to impose HCAs in Alaska as well -- again without a shred of evidence that they will work here -- or that they are needed.

In the final analysis, the Forest Service's new TLMP proposal is a seriously-flawed document. It is driven by the Clinton administration's anti-logging, environmental agenda. It is not driven by careful, reasoned scientific inquiry, despite the nearly 200 biologists on the Forest Service payroll in Alaska. It's hard to believe so much money can be spent to produce so little by so many. The American taxpayer should be incensed, not to mention those of us in Southeast who depend on a steady supply of wood for our livelihoods. If this plan is implemented without serious modifications, the timber industry and many of our communities will shrivel.

On May 1, I asked the USFS to extend the comment period to the end of the year. Everyone involved with timber should join me in that request. We must make it impossible for them to say no. Implementation of TLMP must be delayed, the plan carefully scrutinized and largely rewritten, and the USFS put back in the timber supply business.

RDC supports extension of Tongass timber contract

The Resource Development Council recently passed a resolution endorsing a 15-year extension to the Ketchikan Pulp Company's (KPC) timber supply contract with the U.S. Forest Service in the Tongass National Forest. RDC has also gone on record supporting federal legislation authorizing the extension.

The extension to KPC timber supply contract is critical to the future economic well-being of Southeast Alaska, a region which has lost 40 percent of its well-paying, year-round timber industry jobs over the past five years. Ketchikan, the fourth largest city in Alaska, is extremely dependent upon the continuation of the contract which provides the principal source of year-round employment in the region.

KPC's current long-term timber supply contract expires in 2004. The remaining eight years in the contract term is insufficient for the company to amortize \$200 million in environmental upgrades and energy efficiency improvements that are planned over the next several years. The improvements are necessary to ensure that the company remains competitive in the world pulp market and meets evolving environmental requirements.

The company is planning to convert its pulp mill to an elemental chlorine free process and expand its wastewater

treatment plant, as well as upgrade pollution prevention systems. The company also plans to install new equipment and make modifications to further reduce toxicity levels of plant effluent and to relocate the discharge point of those effluents to ensure rapid disbursement of remaining trace chemicals, especially in sheltered waters.

KPC has already made considerable investments in environmental improvements, but without a long-term supply of timber, the company may be unable to make the additional investments and could face closure. With an assured supply of timber, KPC says it can move forward to ensure the mill is environmentally sound and economically competitive for the long-term.

RDC believes the contract extension would promote a proper balance between multiple use interests.

Federal legislation recently introduced by Senator Frank Murkowski would direct the Forest Service to supply Ketchikan Pulp with 192.5 million board feet of timber each year for 15 years. The bill would allow Ketchikan Pulp to convert its facility into a plant which manufactures other value added products that utilize pulp logs and residual chips as a raw material.

KPC, which obtained its original

long-term contract in 1954, is the sole remaining pulp mill in Alaska. It comprises more than 50 percent of the total commercial tax assessments for the Ketchikan Gateway Borough. With an annual payroll of \$41 million, the company employs 900 people at its pulp and sawmill operations. More than 22 percent of all households in Ketchikan are dependent on KPC timber operations and the company accounts for more than 25 percent of the city's total annual employment wages. In Southeast, the industry generates more than 38 percent of the total employment.

"The issue is whether or not Alaskans can manage their vast forest lands to provide viable habitat for wildlife, recreation and a forest industry," said RDC Board member Troy Reinhart, who serves as Public Relations Manager for KPC. "The experience over the past 40 years clearly confirms Alaskans can manage that balance very well," Reinhart added. "The Tongass forest lands and streams are healthy by any and all measures while thousands of people have been able to build productive lives growing and producing useful products."

Reinhart warned that without KPC's facilities "maintaining a vigorous economically viable forest industry in Southeast Alaska is very doubtful."

Governor Knowles and the Legislature support the KPC extension.

TLMP ... (Continued from page 4)

Unfortunately, the preferred alternative would place more land off limits, further restricting acreage available for harvest. Shaub and Phelps warn this will upset the balance that presently exists between preservation and development.

On the other hand, Alternative 2 of the TLMP document, strikes a balance similar to that which currently exists. It protects high value places within multiple use areas of the Tongass while still providing a sufficient land base for a healthy forest products industry.

Alternative 2 would provide for a 2.2 million acre timber base in the Tongass with a 480 mmbf allowable cut per year, which would equate to about 336 mmbf under the Forest Service's historical pattern of releasing about 70 percent of the allowable cut.

Beetle activity spreads, 892,831 acres infested in one year

While Alaskans continue to debate the merits of cutting dead, beetle-killed timber across private and public lands in Southcentral Alaska, spruce beetle activity increased 40 percent in 1995 over the devastating levels detected the previous year.

Approximately 892,831 acres of ongoing and newly infested areas were detected last year, the highest level of activity on record. The most extensive areas of beetle infestations are in Southcentral Alaska (683,281 acres) and the Copper River basin (170,767 acres). More than 25 million spruce trees have been infested.

The Forest Service's 1995 Forest Health Management Report revealed that beetle activity in the Chugach National Forest doubled in 1995 to more than 32,433 acres. It noted that beetle activity is increasing throughout the Turnagain Arm area, including Girdwood, Twenty Mile, Ingram Creek, Sixmile River drainage and Hope. The Forest Service also noted the beetle infestation is intense throughout many areas of the Kenai Peninsula, including Kachemak Bay. From Tustumena Lake to Homer, beetle activity is extreme. More than 400,000 acres of spruce are infested with many stands having more than 60% mortality.

A significant increase in beetle-killed timber was found on the west side of Cook Inlet and the infestation more than doubled in the Anchorage Bowl where more than 8,000 acres of spruce were hit. Areas in Anchorage with the heaviest activity are Hillside, Fire Island, Kincaid Park, and the Eagle River and Eklutna River drainages.

With a dry, warm summer at hand, foresters believe severe outbreaks of beetle activity will continue throughout the summer. While there is ongoing debate on the fire danger posed by standing, beetle-killed timber compared to green timber, foresters agree that fire danger over the long term is heightened considerably once the dead trees

fall over on top of each other and fill the floor of the forest.

Three salvage logging proposals have been proposed for the Chugach National Forest to harvest beetle-killed timber, but the Forest Service — in the face of intense pressure from environmental groups — has scrapped one plan, severely reduced the scope of

Environment (ACE) has formed the Forest Defense Network to whip up public opposition against logging and influence public policy. In a recent mass mailing, ACE noted the Forest Defense Network is kicking into high gear with a door-to-door campaign. Media campaigns are being developed and demonstrations are being planned



RDC Board member Paula Easley refers to a newspaper account of the devastating Big Lake Fire while addressing forest health. Foresters warn fire danger will rise throughout Southcentral Alaska as beetle-killed trees fall and cover the forest's floor. Pictured at left is David Parish.

another and is considering new public comment on a third.

Under the salvage law passed by Congress last year, the Forest Service had initially identified about 1,300 acres of 12,000 heavily-infested forested acres in the Sixmile area for logging. That proposal has now been reduced to a mere 182 acres -- 2% of the infested trees in the Sixmile area. A logging plan for the heavily-infested Seattle Creek drainage has been discarded, but the Forest Service is reviewing public comments for a third proposal in the Resurrection and Palmer Creek valleys near Hope.

Environmentalists are not satisfied with the Forest Service decision to scale back logging plans and have admitted they won't be happy until ALL logging plans are dropped.

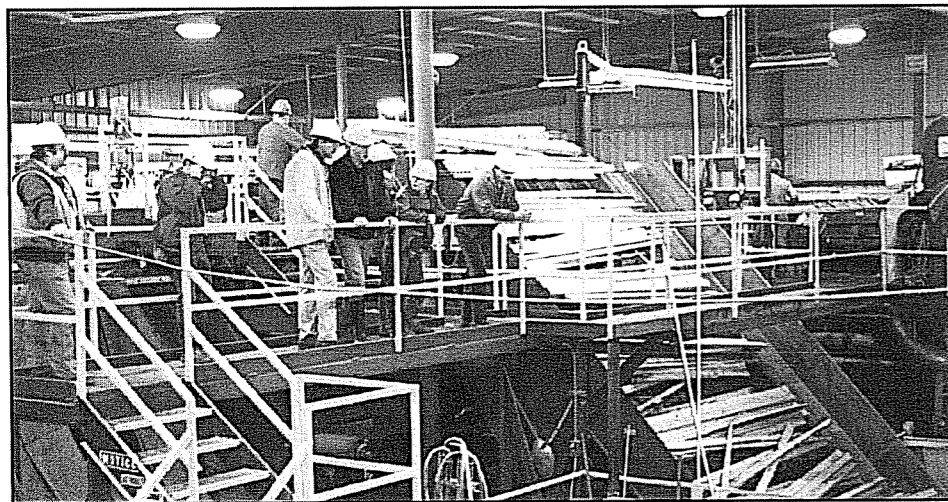
The Alaska Center for the

among other events and programs. ACE is asking Alaskans to join its network, write letters, participate in direct actions and "help stop senseless logging."

The campaign has generated scores of letters to the Anchorage Daily News and the Forest Service in opposition to logging. ACE has asked its members to host letter writing parties targeting not only the Anchorage Daily News, but newspapers outside Alaska, including the Los Angeles Times.

The cover of the ACE mailer featured a picture of a clearcut with the superimposed headline, "It's Time To Clearcut Our Kenai Peninsula: Do You Agree or Disagree?" The mailer was filled with emotion and left readers with the impression that a healthy and green forest was being clearcut at alarming

(Continued to page 8)



KPC invested \$54 million in initial capital outlays for its dissolving pulp mill, \$90 million in additional capital costs since the mill began operating in 1954 and \$11 million in construction of a small log dimensional lumber mill. The lumber mill is pictured above. (Photo by C. Portman)

TLMP proposal flawed, reflects anti-logging, environmental agenda

(Continued from page 1)

Director of the Alaska Forest Association. Phelps labeled the Forest Service's new TLMP proposal as a "flawed document...driven by the Clinton Administration's anti-logging, environmental agenda." He said the new proposal is not driven by "careful, reasoned scientific inquiry."

The TLMP revision would add 500,000 acres to existing no-cut zones in the form of Habitat Conservation Areas. It also withdraws more land for fish habitat protection by increasing buffers along anadromous fish streams. Large blocks of old-growth timber within cutting areas would be included in the Habitat Conservation Areas.

Phelps charged that there is no new evidence to support the increase in buffer standards. Moreover, the new proposal imposes a wildlife protection strategy without any scientific study to verify that Habitat Conservation Areas are an appropriate model for the Tongass, Phelps added.

Meanwhile, Senator Frank Murkowski says that the Forest Service's analysis of the plan's social and economic impacts on Southeast Alaska communities was rushed and incomplete. He said the Forest Service did a better job evaluating the plan's effect on wildlife than people.

Murkowski held hearings across Southeast Alaska over the past several weeks to discuss the plan. He expressed concern that the plan would prevent mills in Wrangell and Sitka from re-opening and leave current operations short on wood.

Forest Service officials said their economic, social and wildlife analysis was more than adequate for its land management plan and that the plan would free up enough timber to supply KPC and other operations. The Forest Service predicts the new plan will meet 95 percent of market demand and that there should be no job losses if the



The timber industry is a major force in the Southeast Alaska economy, accounting for 38 percent of year-round employment and more than \$43 million in annual payroll.

(Photo by Carl Portman)

proposed plan is adopted.

Critics of the plan, however, note that the socio-economic impact analysis is very superficial, follows no known econometric techniques and does not compare the effects of the alternatives. They also note that the Forest Service is changing the way timber volume is measured and is closing some of the most productive timber stands to logging. As a result, they don't believe the Forest Service will be able to meet demand or hold the line on job losses. Moreover, they point out that the Forest Service has historically released less than 70 percent of its allowable sale quantity for any given year.

The proposed harvest level is insufficient to sustain the remaining industry, let alone restore the lost capacity, according to timber consultant Thyes Shaub, an RDC Board member. Shaub explained that the real merchantable harvest under the Forest Service proposal is only 237 mmbf, after deducting utility volume. When KPC's timber is deducted, only about 60 mmbf is left for existing independent producers, not 100 mmbf as the Forest Service has

suggested.

Shaub said such harvest levels are inadequate to sustain independent mills and absolutely precludes reopening the Wrangell sawmill or consideration of a by-products facility in Sitka.

She explained that the preferred alternative in TLMP favors restricting timber harvest more than is necessary to protect the environment, reflecting a philosophy by the Clinton administration that erring on the side of caution is preferred.

Shaub said research shows that current levels of protection for wildlife and fish are more than adequate on the Tongass. "Data shows that current measures to protect the environment and the region's wildlife are working," Shaub said. "Residents of Southeast Alaska can be proud that they have been good stewards of the Tongass. Environmental measures here exceed those in place on any other national forest, proving that a healthy environment can coexist with timber harvesting when multiple values share the Tongass."

(Continued to page 6)

What you can do TLMP Alternative 2 is a better choice

RDC members are strongly encouraged to submit written comments to the Forest Service on the Tongass Land Management Plan (TLMP) Revision. The 90-day public comment period ends Friday, July 26. RDC recommends Alternative 2, which provides for a timber base of 2.2 million acres and an allowable annual cut of 480 million board feet. Comments should be sent to: Tongass Land Management Plan Team, 8465 Old Dairy Road, Juneau, AK 99801.

Below are some actions readers should take to help the Southeast Alaska timber industry and the region's economy.

- Call Governor Tony Knowles' office to request that he ask President Clinton to extend the comment period for TLMP to the end of the year. After you call, have your friends, neighbors and associates call. Ph: 465-3500 Fax: 465-3532. The scheduled comment period falls in the middle of the busiest part of the work season for loggers, fishermen and tourism operators. Given the timing of the comment period, it is unrealistic to think that those most affected by the plan can consider two volumes of technical material in 90 days when the Forest Service took eight years to complete the revision.

- Send a letter to Forest Supervisor Phil Janik at the TLMP address listed above requesting the extension.

- Call the Forest Service at 586-8700 for a copy of the TLMP summary. After reading the summary, write the Forest Service a second time to express your position. Choose the alternative you feel most comfortable with, however, RDC recommends Alternative 2.

Brief points to consider for TLMP Revision letter

- The Preferred Alternative favors restricting timber harvest more than is necessary to protect the environment. Research shows that current levels of protection for fish and wildlife are more than adequate in the Tongass.

- The Preferred Alternative would place additional lands off limits to harvesting, upsetting the balance that presently exists between preservation and development.

- The Preferred Alternative grants a higher priority to protecting against "potential" harm to fish, wildlife and plants than to protecting against the certain harm to people.

- The Preferred Alternative will seriously reduce timber harvests from current levels, which will result in more lost jobs added to the 1,700 that have been lost since 1980.

- The Forest Service's approach to socio-economic analysis is flawed. A thorough analysis of the effects of TLMP on the various communities dependent on timber harvesting should be conducted. The TLMP Revision proposes a Preferred Alternative without adequate socio-economic impact analysis.

- The Preferred Alternative proposes to implement habitat protection strategies that are unproven in this particular ecosystem.

- The Preferred Alternative is unacceptable; the Forest Service should implement Alternative 2.

- Alternative 2 strikes a balance similar to that which is now in place, protecting high value areas while still providing a sufficient land base for a healthy forest products industry.

Other discussion points for TLMP Revision

Goshawk: No systematic survey has been done to determine the extent of its presence in Southeast Alaska, but it is known that the region is at the extreme northern end of the Goshawk's natural range. Absent compelling concerns for its safety, special protections should not be implemented, especially if they have a negative effect on people who live in Southeast.

Wolf: There is no scientific evidence suggesting that the wolves in Southeast are a distinct subspecies. Furthermore, evidence suggests wolf populations are high. Again, absent credible scientific evidence, people should take precedence over any new protective measures on the wolf.

Deer: Populations are healthy, as indicated by bag limits set by the Alaska Department of Fish and Game. The historic levels and patterns of timber harvest have not diminished deer presence in the region. There is no need to curtail activities on behalf of the deer.

Salmon: Fish stocks are healthy and strong runs are recurring. Recent studies have shown that riparian buffers under the current forest plan are adequate to protect fisheries. A recent report released by the National Oceanic and Atmospheric Administration indicates that the present level of salmon habitat protection is adequate.

Questions to ask

- Where is the scientific justification for new withdrawals, whether in the form of Habitat Conservation Areas (HCAs), Goshawk circles or expanded riparian buffers?

- Where is the scientific analysis that justifies imposing HCAs on the Tongass where conditions are remarkably different than the South Pacific Island where the HCA strategy was developed?

- The Forest Service has only been able to release between 200 and 300 mmbf of timber over the past several years under an allowable harvest ceiling of 420 mmbf. How can it expect to release 290 mmbf if the new allowable cut is a mere 297 mmbf?

Source: Alaska Forest Association