

March 10, 2016

House Subcommittee on Federal Lands  
United States House of Representatives  
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Washington, D.C. 20515  
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Subj: Comments on H.R. 3650, the “State National Forest Management act of 2015”

Dear Members of the Subcommittee on Federal Lands;

On behalf of Greenpeace members nationwide who rely upon the extent and integrity of America’s national forests, I provide these comments on HR 3650 (the “State National Forest Management Act of 2015”) and on the testimony the subcommittee heard about the bill on February 25. These are timely comments, submitted within the allotted ten business days.

We focus particularly on how the bill relates to the Tongass National Forest, because the two witnesses who testified on the bill did so. Those witnesses were the bill’s author, Rep. Don Young, and Bryce Dahlstrom of Viking Lumber. On September 28, the day the bill was introduced, Tom Crafford of the State of Alaska represented the governor in testimony before this subcommittee, similarly asking for the state to be allowed to carve 2 million acres of forestland out of the Tongass National Forest. The bill, however, would extend such power to all states that have national forests within their borders.

The facts presented by all three gentlemen were preposterous exaggerations, as explained and documented below. We believe their testimonies demonstrate that the concept of the bill is wholly lacking in merit, regarding not just the Tongass but national forest nationwide.

Introducing myself, I am a 39-year resident of southeastern Alaska, having moved here as an engineer for Alaska Pulp Corporation. I soon quit the company, when I realized the timber program of that time on the Tongass National Forest was unsustainable. I have been immersed in forest issues here ever since, and know the region well.

### **Some Incorrect and Misleading Facts from the Testimonies**

The three testimonies were wholly misleading. Here, for brevity, I will discuss problems with just the main points stated on February 25. Detail is provided in Exhibit 1, which is a critique of every significant point that Tom Crafford made in his September 28 testimony.

1. Comparison of the timber base to the enormity of the Tongass National Forest. Both Rep. Young and Mr. Dahlstrom compared the 672,000 acre timberbase available to industry on the Tongass, as “only 4 percent” of the 17 million acres expanse of the Tongass. The deception there is that two-thirds of the Tongass National “Forest” is either unforested land (rock and ice at high elevations, muskeg bogs, etc.) or areas of unproductive forest that are little more than shrubbery. Their statements also ignore that, combined on all federal and non-federal land ownerships in or adjacent to the Tongass NF, nearly 900,000 acres of old-growth forest has been clearcut since 1954, when large-scale logging began in the region. The cumulative impacts of that logging are substantial.

2. What about the claimed loss of 5,000 jobs since a few decades ago? In his written testimony, Mr. Dahlstrom claimed that number of jobs had been lost in the industry since 20 years ago. In fact, the industry’s employment peaked at 3,500 in 1989 to 1990, and moreover

this was employment for logging on all land ownerships, not just the Tongass NF, and all the milling. [See Exh. 1 at 9 to 10 for details and sources]. This was a sharp peak in employment associated a similar peak in timber production, driven by the Native corporations liquidating their collectively huge land holdings and a briefly exceptional global market for pulp produced from Tongass timber. This was a one-time, unsustainable boom that was followed by a steadily declining bust caused by exhaustion of the non-federal timber, the best national forest timber having been high-graded, and the region being out-competed in deteriorating global markets. Of course the rate of logging has returned to pre-1954 levels; no surprise! The boom is now over a quarter-century in the past; the region has taken that downturn in stride and it is behind us — except for the enduring loss of all that old-growth forest.

3. The comparison of timber sale performance on the Tongass NF and the State Forest. Rep. Young and Mr. Dahlstrom both claimed that the Alaska’s timber program is more efficient than the one on the Tongass NF, citing 18 months to prepare state forest sales versus 5 years for Tongass ones. To the contrary, our assessment shows the federal program is faster.

For the largest Tongass timber project in over 20 years, Big Thorne, the Forest Service published a Notice of Intent in February 2011, a DEIS in October 2012, a decision in June 2013, and an advertisement for sale of two-thirds of the timber in August 2013. That is 2-1/2 years, half the time Mr. Crafford stated. Logging (now on-going) was then delayed year, because the State of Alaska had withheld adverse wildlife information from the Forest Service during the NEPA process. [See Exh. 1 at 7]. For other Tongass sales, Tonka, took 3.5 years and Logjam 4.5 years from scoping until contract signed. Four significant State of Alaska timber sales we have been tracking have been in planning for 3, 3, 6 and 9 years – with no timber sold from any of them yet and planning not completed on three – as detailed in Table 2 (in Appendix A to these comments).

Mr. Young also claimed that the state’s sale program is better than the Tongass one, alleging the former sells a higher percentage of its annual sale quantity (ASQ). He ignored that the two agencies’ ASQs have different meanings. The state’s ASQ is a target, and is small. The Forest Service’s ASQ is a very large *high cap* that cannot be attained because of the limiting decades-long national and global market conditions that have existed for a few decades. In fact, the Tongass ASQ has been locked at its Phase 1 level of 150 million board feet (mmbf ) per year since 2008, not the 267 mmbf cited by Young. [See: 2008 TLMP ROD at 9]. Triggering Phase Two (ASQ = 200) requires 100 mmbf of production for 2 years, but in all years has been far short due to the long-term market. The Dec. 2015 draft Tongass Forest Plan Amendment proposes lowering the ASQ to a realistic 46 mmbf.

Finally, contrary to Mr. Dahlstrom, Alaska’s Forest Resources and Practices Act *is not* “well respected.” The controversial act does not limit the size of clearcuts. It lacks enforceable provisions for controlling damage to wildlife habitat. Stream buffers provisions to protect occupied fish habitat are minimal, and there are no protections for headwaters streams, which are important to water and habitat quality in lower reaches. [See: Exh. 1 at 1 to 8].

4. Viking Lumber’s situation, and local school enrollment. Rep. Young and Mr. Dahlstrom both claim that Viking Lumber “can operate two more years” only, with Tongass timber. But the Tongass NF has about 600 million board feet of timber planned for sale or to be in some stage of planning over the next five years. Also, using socio-economic multipliers from undisclosed sources, Dahlstrom’s written testimony claims that the Viking mill supports 145 direct and indirect jobs on Prince of Wales Island, resulting in “almost half of the children enrolled in public school on the island.” There are several problems with his estimate. First, he uses general multipliers to estimate indirect jobs and the number of school-aged children per worker; however, research by a Forest Service’s Pacific NW Lab economist shows that there are no valid multipliers for small rural communities in Southeast Alaska:

“Robertson (2003) found that even in small communities where shifts in basic employment may be extreme, the economic base hypothesis (sometimes referred to as indirect job effects) is not supported by the empirical evidence. Linear indirect impact multipliers derived from modeling are, therefore, not applicable in small communities. “The presence of significant secondary impacts resulting from changes in resource-based economic activity cannot be taken as a matter of fact” (p. 84). Robertson goes on to explain that although outside income sources and local economic activity are interrelated, the basic sectors of a local economy are not independent pieces that can be linearly modeled and the impacts added to summarize total impacts. Indirect employment coefficients are applicable at large scales, such as large regional or statewide assessments. However, they are not useful at small local scales, and are in fact misleading.”

[Exh. 2, Alexander 2011 at 1-2 (statement of the USFS Alaska Regional Economist)]. Secondly, in his calculations Dahlstrom greatly underestimated the enrollment in Prince of Wales Island schools. Reversing his arithmetic (which used the two unjustified multipliers) shows that he assumed a school enrollment of about 500 on the island. It actually is nearly 900. Here is the complete, current listing, from on-line data accessible at the Alaska Dept. of Education & Early Development website:

Table 1 — **Current school enrollment on Prince of Wales Island, 2016**

Schools	Enrollment
Craig City Schools	527
Hydaburg City Schools	88
Klawock City Schools	114
<i>SE Islands School District:</i>	-
Hollis	22
Coffman Cove	14
Naukati	19
Port Protection	13
Thorne Bay	77
Whale Pass	10
	<b>884</b>

5. An ESA petition did not delay Mr. Dahlstrom’s timber sale. As noted in item 3, the State of Alaska is responsible for the one-year delay in the Big Thorne timber sale, by withholding information concerning the Alexander Archipelago wolf that was adverse to the sale. That was separate from the ESA proceedings. Although an ESA listing was denied for the subspecies by USFWS this year, a conservation concern remains for the wolf population on the island (Prince of Wales) where Big Thorne is located. The decision noted the 75% decline in this population since 1994, and also said: “[We] consider the GMU2 wolf population to demonstrate low resiliency and, as predicted by our model” to decline 8-14% more over the next 30 years, “largely owing to reduced deer abundance due to timber harvest, high rates of total wolf harvest, and a combination of these factors.” (Status Assessment at 118).

**Carbon Sink & Climate Change Problems with H.R. 3650**

Climate change “represents an urgent and potentially irreversible threat to human societies and the planet.” [Exh. 3, UN 2015 at 1]. According to the EPA, current atmospheric concentrations of greenhouse gases endanger public health and welfare. The point is, choices being made by Congress are critically important when they affect the function of carbon sinks (especially forests) or the rate of society’s carbon dioxide (CO<sub>2</sub>) emissions. CO<sub>2</sub> is highly persistent in the atmosphere, so impacts made now will endure for many centuries.

H.R. 3650 will worsen climate change and its harms by reducing carbon storage in old-growth forests – particularly in southeast Alaska – by avoiding a transition from old-growth to second growth logging. The consensus opinion of scientific experts is that old-growth logging

results in substantial CO<sub>2</sub> emissions with corresponding effects on forest carbon stores and sequestration rates. Indeed, the Forest Service’s National Roadmap for responding to climate change recognizes the need to manage the public’s natural forests for carbon storage, to compensate for fossil fuel emissions. Thus, forest management must “play a critical role in ensuring that forests remain a net carbon sink,” and doing so “is one of the most cost-effective carbon storage measures.” [UN 2015]. The bill does the opposite, and would have significant, long-term climate impacts.

The Forest Service has concluded that the Tongass National Forest “stores more forest carbon than any other national forest in the United States,” and that its carbon storage capacity is a “critical ecosystem service.” [2015 TLMP DEIS].<sup>1</sup> Southeast Alaska contains 19% of the world’s remaining coastal temperate rainforest, making it a large and important carbon sink. [*Id.*]. However, annual CO<sub>2</sub> emissions from logging and mortality in southeast Alaska nearly offset the amount of carbon annually removed from the atmosphere. [*Id.*].

H.R. 3650 would be a decision to manage forests in the United States as net emitters of CO<sub>2</sub>, worsening climate change rather than continuing the function of these as carbon sinks that are mitigating CO<sub>2</sub> emissions from other sources. The bill is oblivious to national and international policy commitments aimed at conserving forests to provide this mitigation, and to expert scientific opinion which concludes that globally significant carbon sinks such as the Tongass National Forest are critically important for mitigating climate change.

The relationship between carbon flux and forestry is not complex. In fact, it is simple — old growth forests store and sequester massive amounts of carbon for centuries; ten times as much as regenerating forests. Logging old-growth forests results in a net transfer of CO<sub>2</sub> to the atmosphere in two ways. First, logging results in immediate and direct CO<sub>2</sub> emissions. In general, logged forests are net emitters of CO<sub>2</sub> for decades. Second, it reduces carbon sequestration potential of forests by removing trees that otherwise would have continued to draw CO<sub>2</sub> from the atmosphere. Old-growth forests are champions in terms of long-term carbon storage, and experts agree that it will take at least a century to make up carbon loss caused by logging old-growth forests. Thus, logging worsens climate change; but conserving forests increases carbon storage, mitigating climate change. In fact, the concept is so simple that experts have identified carbon storage and sequestration in forests as “the low hanging fruit” in terms of climate change impacts. [DellaSala 2015; 2015 TLMP DEIS].

Indeed, one recent review of estimated net carbon flux from federal logging in southeast Alaska showed that “*only a no-logging scenario* maintains carbon stores through time.” [Exh. 4, DellaSala 2015]. Experts have concluded that there is a substantial loss of CO<sub>2</sub> to the atmosphere even when timber operators utilize most timber lumber production. Thus, carbon storage in wood products does not offset CO<sub>2</sub> emissions from logging. [*Id.*].

Overall, conservative estimates show that forestry (i.e. logging) is the third largest source of global emissions behind energy and industry, and contributes more emissions than the entire global transportation networks. Loss of old-growth forests is “a significant source” of atmospheric carbon. Even when considering old-growth forests as a small portion of the earth’s land surface, “old-growth forest conversion appears to account for a noteworthy 2% of the total [carbon] released because of land use changes in the last 100 years. [*Id.*]. Total CO<sub>2</sub> emissions from the Forest Service’s proposed plan for logging on the Tongass National Forest alone would average in excess of 4 million tons per year — equivalent to 4 million automobiles — and cumulatively would exceed 100 million tons over a 25 year period. [*Id.*].

Because *overall* greenhouse gas emissions must be reduced in the very near term in order to avoid just the worst impacts of climate change [Exh. 3 (UN 2015)], there will be significant

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<sup>1</sup> 2015 Tongass Land Management Plan DEIS, at 3-13.

impacts from the immediate releases of CO<sub>2</sub> and the lost sequestration capacity that prolonged old-growth logging on the Tongass will cause, compared to the much longer-term releases from the natural death and decomposition of live trees over decades or centuries. Short-term CO<sub>2</sub> emissions and lost sequestration capacity that result from forest management decisions are critical for limiting climate change, toward squelching its impacts.

For this reason, Article 5 of the 2015 Paris Agreement states that “[p]arties should take action to conserve and enhance, as appropriate, sinks and reservoirs of greenhouse gases, ... including forests.” [UN 2015 at 22]. President Obama’s climate action plan similarly recognizes that “America’s forests play a critical role in addressing carbon pollution.” [Exh. 5, Obama 2013, at 11]. Thus, the President’s plan seeks “to ensure our forests continue to remove carbon from the atmosphere” and promises to work internationally to reduce CO<sub>2</sub> emissions caused by forestry in other countries.

According to the EPA, forests in the United States “play a critical role in addressing carbon pollution, removing more than 13 percent of total U.S. [greenhouse gas] emissions each year.” [Exh. 6, EPA 2015 at 64885]. National forests store one-fourth of the total carbon stored in U.S. forests, and overall the coastal temperate forests in southeast Alaska and the Pacific Northwest have the highest carbon density in any national forest per acre, by every relevant measurement – carbon stored in soil, in standing trees, on the forest floor and below ground. Southeast Alaska contains 19% of the world’s remaining coastal temperate rainforest. [2015 TLMP DEIS]. The Tongass National Forest is thus significant both nationally and globally as a carbon sink, but will only remain a sink under a scenario of no harvest of old-growth forest. Indeed, hundreds of the leading resource scientists in the United States urged the Forest Service to protect forest carbon stores, including the Tongass National Forest, as integral to stabilizing global climate change. [Exh. 7, 2014 scientists letter].

## **Conclusion**

Greenpeace urges the Federal Lands Subcommittee to take *no action* on H.R. 3650.

Sincerely,



Larry Edwards, Forest Campaigner

Attached: Appendix A (Table 2).

## References:

- Exh. 1: Greenpeace (2015): Critique of 9/29/15 testimony of Tom Crafford (State of Alaska) to the Federal Lands Subcommittee.
- Exh. 2: Alexander (2011): Employment Coefficients and Indirect Effects, for NEPA planning: 2011 Update. By the USFS Alaska Regional Economist.
- Exh. 3: UN-FCCC (2015): Adoption Of The Paris Agreement. COP 21, 12 Dec. 2015.
- Exh. 4: DellaSala (2015): The Tongass rainforest as Alaska’s first line of climate change defense and importance to the Paris Climate Change Agreements.
- Exh. 5: Obama (2015): The President’s Climate Action Plan. Executive Office of the President. June 2013.
- Exh. 6: EPA (2015): Carbon pollution emission guidelines for existing stationary sources: Electric utility generating units. Fed. Reg. Vol. 80, No. 205, ff. 64662. 23 Oct 2015.
- Exh. 7: Letter from 201 scientists to USDA Sec. Vilsack, “Re: Scientific support for completion of old-growth logging transition on the Tongass by the end of the Obama Administration.” 15 Oct. 2014.

## Appendix A — ( Large Tables )

Table 2 — **Progress on four Alaska DNR/DoF timber sales, Southeast State Forest, across years**

(Sources: biannual Five-year Schedules of Timber Sales [ *FYSTS* ], and project milestones)

	<b>Coffman Cove Sale</b>		<b>N. Thorne #4 Sale</b>		<b>Edna Bay Sale</b>		<b>Vallenar Sale</b>	
	Activity	Planned Year of Sale	Activity	Planned Year of Sale	Activity	Planned Year of Sale	Activity	Planned Year of Sale
<b>2007 FYSTS</b>	I.D.'d for harvest	<b>2007</b>	-	-	-	-	-	-
<b>2009 FYSTS</b>	"started layout"	<b>2010</b>	I.D.'d for harvest	<b>2010</b>	Conceptual	<b>2013</b>	-	-
<b>2011 FYSTS</b>	"started layout"	<b>2012</b>	?	<b>2013</b>	?	<b>2015</b>	-	-
<b>2013 FYSTS</b>	"started layout"	<b>2016</b>	?	<b>2013</b>	?	<b>2015</b>	Initial notice	<b>2014</b>
<b>2014</b>	<b>PBIF, December</b>	-	<b>PBIF, Jan.</b>	-	<b>PBIF, Nov.</b>	-	-	-
<b>2015 FYSTS</b>	?	<b>2015</b>	?	<b>2015</b>	(in review)	<b>2016</b>	?	<b>2017</b>
<b>2015</b>	-	-	-	-	-	-	<b>PBIF, Jan.</b>	-
<b>2015</b>	-	-	-	-	<b>FBIF, Oct.</b>	-	<b>FBIF, May</b>	-
<b>2015</b>	-	-	-	-	Appeal, Nov.	-	Appeal, May	-
<b>2016</b>	-	-	-	-	-	-	App. Decided, Feb.	-
<b>Years in Planning:</b>	<b>9 years</b> , so far		<b>6 years</b> , so far		<b>3 years</b> , so far		<b>3 years</b> , if schedule holds	
<b>Status:</b>	PBIF contested, no FBIF yet		PBIF contested, no FBIF yet		FBIF under appeal		Revised BIF required	

( PBIF / FBIF = preliminary or final best interest finding )