

Critique of Alaska Governor's-Office Statements to the House Federal Lands Subcommittee

Re: Testimony of Tom Crafford on Sept. 29, 2015

by Larry Edwards
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November 3, 2015 (Rev. 1)

Tom Crafford testified on Sept. 29, 2015 at the Federal Lands Subcommittee's *Oversight Hearing on Federal Forest Management*, on behalf of Alaska's governor and in support of a transfer of two million acres of Tongass National Forest land to the state or other entities. This report challenges the veracity of his testimony, which contrasted forest management done under State of Alaska law (which applies to all non-federal forestlands, public and private) with federal management on the Tongass National Forest. I believe his testimony was simply wrong on essentially every point, misleading Congress on the forest management situation on both federal and non-federal forestlands in the region (Southeast Alaska) that includes the Tongass. The purpose of this critique is to identify the features of his testimony that would grossly mislead Congress if not exposed, and to reveal facts the testimony failed to disclose and which conflict with the state's request for either the outright giving away of Tongass forestland or granting the state management-in-trust over Tongass lands.

About myself: I came to Southeast Alaska in 1976 as an engineer for Alaska Pulp Corporation, and have been involved in forest issues here since leaving the mill in 1978. I have been a Forest Campaigner for Greenpeace in the region for about fifteen years.

Point-by-point responses to Mr. Crafford's assertions

Below, Mr. Crafford's ten main points are quoted or summarized, followed by an exposé of the incompleteness or other untruths of each one. The ten points encompass practically every one he made. Footnotes provide time-code citations for the video of the hearing that is posted on YouTube (https://www.youtube.com/watch?v=nwEi7ypR_3A).

- 1) *Crafford assertion: Alaska's Forest Practices and Resources Act is "[c]ertainly far, far more streamlined and far less cumbersome than federal rules¹ ... while at the same time we think it provides those appropriate protections for other resources"²*

Alaska's Forest Practices & Resources Act (FRPA) is extremely weak, and does not adequately protect other resources. The act has no enforceable protections for wildlife or wildlife habitat, which is particularly glaring because the act places no limit on the size of clearcuts. The statute also lacks requirements to consider cumulative impacts — a particularly important matter across multiple land ownerships at the landscape scale, in the many areas of southeastern Alaska that have been very heavily logged over a period of several decades.

Although FRPA does place some emphasis on aquatic resources, the streamside no-cut buffers it requires as protection along fish-bearing stretches are minimal on non-federal public forestland (100 feet from the banks) and sub-minimal on private forestland (66 feet). The provisions have not been scientifically peer reviewed for efficacy, variances from the requirements are commonly granted, and upper reaches of streams are not protected.

Below are *October 5, 2015 photos* of recent logging administered under FRPA on private land (two parcels owned by Sealaska, Inc.) and "other public land" (owned by the Alaska Mental

¹ Time code 1:09:31.

² Time code 1:10:18.

Health Trust). Figure 1 shows recent logging by Sealaska on the Cleveland Peninsula,³ an extension of the mainland in Southeast Alaska. The photo spans about 1.5 miles across.

Fig. 1: West end of the Cleveland Peninsula, 5-Oct-2015.



Figure 2 is north Election Creek⁴ (Prince of Wales Island). It is one of the forest parcels Sealaska obtained in December 2014 in a National Defense Appropriations Act rider, and clearcutting began promptly. When in federal ownership, it was a vital, designated old-growth habitat reserve, ecologically holding together a very heavily logged area of the island (see also Figs. 3 & 4).

Fig 2: North Election Creek, 5-Oct-2015



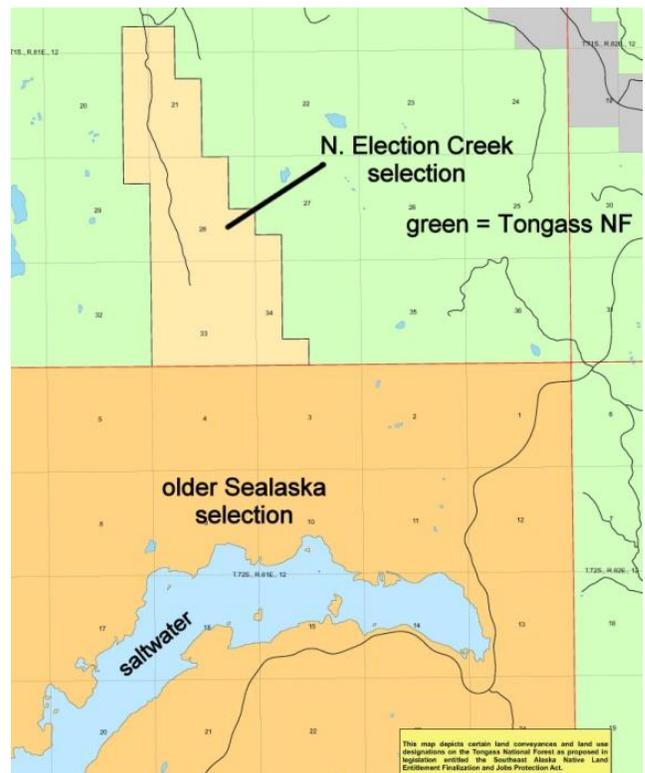
³ Cleveland Peninsula, Sealaska parcel: Lat. 55° 37' 21.50" N, Long. 132° 10' 40.90" Ws

⁴ North Election Creek, Sealaska parcel: Lat. 55° 41' 00" N, Long. 133° 0' 0" W.

Fig. 3: 2003 imagery of North Election Creek [upper left of center] and surroundings (Google Earth)



Fig. 4: Land ownership legend for the above.



Figs. 5 & 6: Ak Mental Health Trust land. Leask Lakes parcel,⁵ ~4,000 acres, Revillagigedo Island. 5-Oct-2015



⁵ Leask Lakes, Alaska Mental Health Trust parcel: Lat. 53° 30' 40" N.; Long. 131° 31' 40" N.

I believe the above explanation and photographs (and Fig. 7, below) demonstrate that the State of Alaska cannot legitimately claim that it is capable of balanced multiple use forest management. Its management and oversight of non-federal forests falls far short of being equivalent to management of the Tongass National Forest as prescribed by the Multiple-Use and Sustained Yield Act and the National Forest Management Act. In fact, the implementation of FRPA always shows a strongly timber-first bias. Mr. Crafford's testimony is contradicted by the facts on the ground, and is extremely misleading. Although we have legitimate complaints about the Forest Service's management of the Tongass National Forest, management of non-federal lands under state law is far from balanced.

2) *Crafford assertion: "[T]he act [FRPA] has been updated several times as new science becomes available."*⁶ *"Scientific findings are reviewed in a two-step process, through Alaska's Board of Forestry and effectiveness and implementation components that ensure that best management practices (or BMPs) remain current."*

Policy has consistently trumped science at the legislative and administrative levels in Alaska regarding forest management issues, ever since the inception of FRPA in 1979 and throughout its revisions. The FRPA has never been subjected to a rigorous scientific peer review, in contrast to review given the conservation strategy that is part of the Tongass Forest Plan. The Alaska Board of Forestry is biased toward timber industry interests through both its legislated composition (AS 41.17.041) and frequently over the years the nature of individuals selected for the few board seats that ostensibly provide counterbalance. The inclusion of those few seats is at best a token effort and not a serious one for ensuring wise multiple use management. The board should not be considered a reliable judge of the available conservation science about logging impacts and how it should be applied. Detailed minutes of the board's meetings are on-line, and even a cursory review shows that the board serves primarily as an advocate for the timber industry, without the needed balance.⁷ Additionally, as discussed elsewhere in these comments, the State of Alaska has demonstrated its budgetary inability to provide the protections that the FRPA does require.

3) *Crafford assertion: FRPA is administered with the "three-legged stool" of the resource departments: Fish and Game, Environmental Conservation, and Natural Resources.*⁸

Both the State of Alaska's policies (including the FRPA) and the state's severe budgetary crisis largely prevent the three resource agencies from regulating non-federal logging activities in a way that is compatible with multiple uses and ecosystem integrity.

The FRPA budgetary situation: In December 2014 the incoming governor exposed Alaska's severe budget crisis to public view, and it is broadly expected to endure far into the future. Oil production revenue is the state's primary funding source, and with the recent unforeseen substantial drop in per-barrel oil prices the state has been far short of funding its obligated operations. Deep cuts were made across agency budgets in this year's legislative session, and more cuts are planned for the next two years. The three state agencies that implement the FRPA, especially DNR's Division of Forestry (DoF), have been hit hard. This is documented in news articles⁹ and the Alaska Board of Forestry's (BoF) July 2015 minutes.¹⁰ In the Division

⁶ Time code 13:26.

⁷ See list of minutes at: <http://forestry.alaska.gov/alaskaboardforestry.htm>

⁸ Time code 16:28.

⁹ Attached documents: (1) Some Southeast timber funds restored, Ketchikan Daily News, 3/11/15. (2) Forestry jobs lost but Haines may retain part of office, KHNS radio, 4/29/15.

¹⁰ Board of Forestry minutes for July 28-29, 2015: http://forestry.alaska.gov/Assets/uploads/DNRPublic/forestry/pdfs/alaskaboardforestry/Minutes_%202015_%20July_%2028-29_draft.pdf

of Forestry's (DoF) Coastal Region (which includes Southeast Alaska), 23 jobs were cut this year, including five of the eleven forester positions, all occupied when cut. The supervisory Coastal Regional Forester position is now only two months per year. (Id. at 10). Initially, in the House Finance's Natural Resources Subcommittee much deeper cuts were passed, likely foretelling the future. Those proposed cuts "would have ended the state's timber program for all but the Alaska Interior and closed [all] state forestry offices in Southeast." (Ketchikan D. News, 3/11/15). As the legislative session closed, a 9-month seasonal forester position was added-back in Haines to keep that office open, and the Ketchikan office was reinstated with three instead of its former five foresters, plus an administrator. The final budget halved the FRPA work of the Dept. of Environmental Conservation's sole staffer devoted to that. (BoF minutes at 1). Fish & Game's FRPA responsibilities go to its Habitat Division, which "took a large budget cut this year," causing it to restrict its fieldwork only to the most important anadromous streams. (Id. at 2). This means there will be no state oversight of logging in any but the most exceptional anadromous watersheds.

The State of Alaska's "One-voice" (timber over-all) policy: Even so, the supposed three-legged stool for applying wisdom in the state's regulation of logging had collapsed long before the budget crisis, through state policy that censors the state's scientists in order to maximize the region's federal and non-federal timber production. A November 2014 Greenpeace report¹¹ exposed the policy, based on 16,000 pages of documents from a public records request. The one-voice policy (a term used within state government) is enforced by an administrative apparatus linked to the governor's office, and has blocked information and professional opinions from Fish & Game's biologists and the Dept. of Environmental Conservation's experts from being considered in timber sale planning or from becoming public knowledge.

So, the state lacks funding to fulfill the requirements of the FRPA (which are inadequate to begin with), and the other agencies are handcuffed from affecting a timber program that is driven by DNR's Division of Forestry and the state government's blind-to-harms policy of maximizing timber output. Mr. Crafford's three-legged stool is just splinters on the floor.

4) *Crafford assertion: State timber sales are designed to protect fish habitat and water quality,¹² with streamside buffers and best management practices (BMPs).*¹³

On *state* forest land,¹⁴ for those stretches of streams that have anadromous (e.g. salmon) or resident fish (Class I and II streams, respectively),¹⁵ the requirements for streamside no-cut buffers are comparable to those used by the Forest Service on the Tongass. However, FRPA provides no buffer protections along streams or tributaries that feed into the Class I and II stretches. The foreground stream running right to left in Figure 1 illustrate this.¹⁶ There is a barrier falls beyond the left of the photo, below which there is a short Class I stretch (to tidewater) that has no-cut buffers on both sides. But in the remainder of the watershed the forest has been removed on one or both sides of the fishless stretch (Class III) and its steep headwaters feeders (Class IV streams). A well-established body of evidence suggests that a lack of Class III and IV stream buffers and the lack of a limit to clearcut size make streams

¹¹ The report is "Big Problem — Alaska's 'One-Voice' resource development policy."
https://www.researchgate.net/publication/268780406_Big_Problem_Alaska's_One-Voice_resource_development_policy

¹² Time code 16:23.

¹³ Time code 16:47.

¹⁴ AS 41.17.118(a)(1).

¹⁵ This Forest Service nomenclature is more commonly used and equivalent to (but simpler than) stream classification nomenclature in the FRPA.

¹⁶ Although the photo is of logging on private land, the AS citation is to FRPA provisions for state land, the principles discussed here concerning the Class III & IV streams shown also apply to state land.

more susceptible to conditions that can harm downstream fish populations. These conditions include: flash flows, increased turbidity and sediment flow, and an increase in stream temperature in summer and a decrease in winter (when salmon eggs are in the gravel).¹⁷

On *private* forestlands, FRPA requires only a 66-foot buffer (instead of 100) on Class I & II streams, allows variances for tree removal from within the buffer, and requires no buffers on Class III & IV streams. This is inadequate, given the broad geographic scale involved.

A separate, important point here is that while Mr. Crafford emphasized the state's protection of aquatic habitat in his testimony, he made *no* mention of wildlife habitat. The FRPA does not specify protections for wildlife habitat, nor does it require the analysis and consideration of contribution to cumulative landscape-scale impacts, across time and all land ownerships.

5) *Crafford assertion: State timber sales typically take about 18 months to plan and offer for sale.*¹⁸ *In contrast, "the federal forest planning process takes "typically about five years" and planning an individual sale "is about another five year planning process."*¹⁹

There are several faults with Mr. Crafford's statement. First, the US Forest Service's planning at the Forestwide and individual timber sale scales are separate, non-sequential processes. That is, revising the Tongass Forest Plan does not delay timber sale decisions.

Second, there is no "typical" period for planning Forest Service timber sales. In increasing levels of detail, some sales are done under "categorical exclusions" from NEPA, and others are done under an environmental assessment (EA) or environmental impact statement (EIS).

However, even large timber sales with EISs have taken less time to prepare than Mr. Crafford suggests. 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. Then, because the State of Alaska had through its "one-voice" policy (see above) withheld from the Forest Service during the NEPA process important information regarding the project's impacts, the project was delayed by a year for preparation of a "supplemental information report." The contract was readvertised in August 2014. That is only three years and two months after publication of the NOI and much less than Mr. Crafford's "five years," despite a one-year delay caused by the state itself.

Third, the Forest Service has multiple timber projects in various stages of planning at the same time – not just one at a time. For example, in 2015, prior to decisions being issued on two major projects, the agency had five major timber projects in planning at the same time.

Finally, the state's short time for timber sale planning on its own forestlands underscores that the FRPA sets a low bar for both planning and environmental protection. Under the FRPA, the "primary purpose" of state forests is timber production, so in planning and decisionmaking the Division of Forestry gives little consideration to non-timber resources and uses. Also, the state has recently become more aggressive in offering timber from its Southeast State Forest. For example, the state intended to offer 80 million board feet in the fiscal year that just ended. This unbalanced, aggressive approach will attract administrative appeals that will cause a narrowing of whatever difference in planning periods may exist now between state and federal sale programs.

¹⁷ See: e.g. Rhodes (2013) at 7-8 and 29-30. The document is a commentary on problems with a Forest Service timber project, but describes relevant concerns for Class III & IV streams under FRPA. See also: Carstensen (2013) at 14, discussing the Election Creek area in Fig. 2.

¹⁸ Time code 16:20.

¹⁹ Time code 1:09:40.

6) *Crafford assertion: Federal timber sales are often marginally economic or can't be sold because they are below-cost.*²⁰

It is unsurprising that Tongass NF timber sales are sometimes marginally economic, for two reasons. As discussed elsewhere in these comments, the most profitable timber on the Tongass has already been cut, through “high-grading” at both the landscape and timber project scales. This has meant, over times going back at least to the 1950s, cutting the best (the highest quality, most easily accessed timber), then the best of the rest, and so on. What is left now is generally closer to what was average quality before, and is often more expensive to access as well. Another reason that timber quality and profitability on the Tongass has diminished is the nature of land entitlement selections by the State of Alaska and Native corporations that have been made since the 1960s²¹ and which generally were for the most valuable timber available. Additionally, in contrast to the Forest Service’s 100 acre clearcut size limit, it must be acknowledged that the *unlimited clearcut size* allowed by FRPA — on state land (Fig 7, below), other public non-federal land (Figs. 5 & 6) and private land (Figs. 1 to 3) — is highly subsidized in the form of uncompensatable losses to watersheds, wildlife and other public values. Keeping Tongass National Forest lands under federal ownership and control will avoid worsening this already uncontrollable clearcutting situation, which is promoted by this state subsidy that the Tongass NF does not and should not offer.

Fig. 7. Alaska Division of Forestry’s South Thorne Bay Timber Sale (5 Oct. 2015)



When Mr. Crafford said Tongass timber sales cannot be sold if they are below cost, he was correct. However, because this well-justified restriction exists by an act of Congress, it is under the control of Congress and therefore is not a justification for Congress to transfer Tongass forestland to the state. Moreover, such transfer to the state (or other entities) would spread farther and wider the kind of destructive old-growth logging shown in the photos.²²

²⁰ Time code 15:42.

²¹ These land entitlements are from the Alaska Statehood Act of 1959 and the Alaska Native Claims Settlement Act of 1971. Also, after the initial selections land swaps with the federal government have intensified the “select the best” approach.

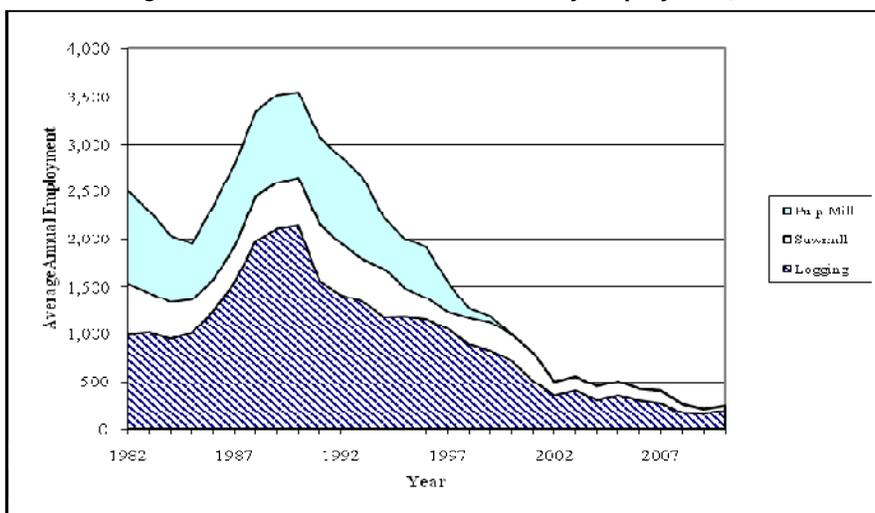
²² The existing Alaska state forest parcels are smaller (e.g. Fig. 7) than those of Native corporations. The land transfer the state is requesting could however result in large parcels and damage as shown in

7) *Crafford assertion: “[F]ederal forest management has so deemphasized timber production in the 17 million acre Tongass National Forest” that only 672,000 acres remains available for timber management, and “timber jobs have fallen from 4,600 in 1990 to about 400 today.”*²³

First, it is absurd to compare the size of an administrative land unit named the Tongass National Forest – two thirds of whose 17 million acres are either non-forest or unproductive forest – to the area of available timberland it contains. The comparison is an intentionally misleading, commonly used ploy the state government and timber industry use to distort debate in order to grab land from the Tongass. Further forestland transfers would break the back of the peer reviewed Tongass Conservation Strategy, which has been a foundation of the Tongass Forest Plan since 1997. Moreover, Mr. Crafford’s false comparison fails to account for the approximately one million acres of land in the region, primarily forestland, owned by the State of Alaska, Native corporations, the Alaska Mental Health Trust and the University of Alaska – all of which are in the timber business.

Mr. Crafford’s timber industry employment figures for 1990 and today are flatly incorrect. A 2013 socioeconomic report done for the Forest Service reveals, “[t]imber employment in Southeast Alaska peaked at the end of the 1980s, with slightly more than 3,500 jobs in 1989 and 1990 (Figure [8, below])”²⁴ — not Mr. Crafford’s 4,600 jobs (probably a statewide number). Also, the decline began about 25 years ago, mainly spanning a dozen years, and there is no reasonable rationale for this old peak to justify another boom (and bust).

Fig. 8. Southeast Alaska timber industry employment, 1982 to 2010



The “logging” sector employment shown in Fig. 8 produced logs not only for the pulp mill and sawmill employment above it, but also for the export of unprocessed round logs – a significant subsector of “logging” employment that the chart does not break out. Export logs came almost entirely from non-federal forestlands, and primarily from those owned by Native corporations. Due to favorable pulp, lumber and log export markets in the late 1980s and earliest 1990s, there were a pronounced peaks in overall timber industry employment in the three sectors: pulp and lumber production (Fig. 8 and the green in Fig. 9) and the export of

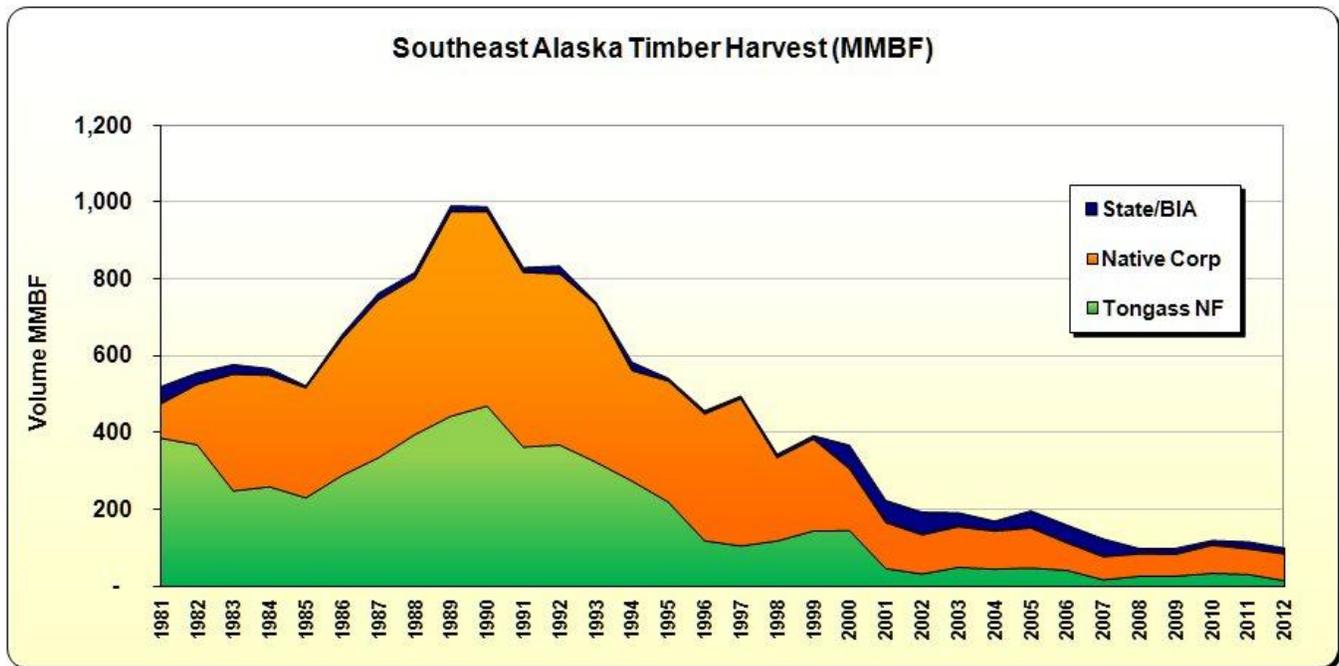
the other photos. Yet, if instead a land transfer were put into smaller parcels of equivalent acreage, to better target the most valuable remaining old-growth, the impacts to wildlife would be much greater than large parcels.

²³ Time code 14:21.

²⁴ Fig. 8 is from “Socioeconomic Resource Report - Final, 2013” (USFS Big Thorne project doc. 736_2234). It originally appeared in several Forest Service ANILCA 706(a) reports to Congress, most recently report #24, submitted in 2011.

logs from Native corporation lands (essentially all of the orange timber volume in Fig. 9).²⁵ Those corporations were liquidating their old-growth forests into cash as rapidly as possible. All together, this is what caused the sharp, unsustainable boom in timber industry employment to 3,500 jobs in 1990, followed by an inevitable bust.

Fig. 9. Southeast Alaska logging levels, by land ownership sector, 1981-2012.



Closures of the Sitka pulp mill in 1993 and Ketchikan pulp mill in 1997²⁶ were significant contributors to the decline of employment to the current level, as shown in Fig. 8. The two pulp mills were selling into a *global market* for dissolving pulp, the two mill’s only product. That market drove an all-time production high in 1974 (in which 590 million board feet was logged on the Tongass National Forest), declined 25% by 1982, recovered somewhat in 1988, and declined globally every year since then except 1995, according to a 2004 Forest Service document. (PNW-GTR-611, at 51-52).²⁷ Demand and prices for dissolving pulp also declined substantially, as new technologies and materials displaced dissolving pulp (e.g. the main end-product, rayon, lost popularity). Indicative of the market’s collapse, other mills making dissolving pulp closed in Port Angeles, Washington in 1997 and Sweden in 1998. (Id.).

Concerning the effect of Native corporation logging on employment, Fig. 9 shows that after timber production began on the lands transferred under ANCSA (the Alaska Native Claims Settlement Act of 1971), the annual volume logged increased quite rapidly. This volume eclipsed the substantial production that had been on-going on the Tongass National Forest. It reached the 1990 crescendo that was afforded by a favorable log export market, followed by

²⁵ Fig. 9 is a compilation of statistics by former Region 10 Economist for the Forest Service, Joseph Mehrkens. Now retired, he has continued to collect the statistics.

²⁶ After Ketchikan Pulp Company closed its mill in 1997, in a timber contract cancellation agreement the Forest Service allowed KPC to log an additional 320 million board feet of timber between 1997 and 2000 for sawmilling and export. This explains the thick tail of the decline in timber volume between those years in Fig. 9 between those years. See: (1) ANILCA 706(a) report #20 report to Congress, for 2000; (2) St. Clair & Cockburn, “The Pulp Parachute: How Louisiana-Pacific Got Paid To Destroy the Tongass,” Minneapolis/St. Paul City Pages, April 23, 1997. <http://www.citypages.com/news/the-pulp-parachute-how-louisiana-pacific-got-paid-to-destroy-the-tongass-6715439>

²⁷ Mazza, R., 2004. Economic Growth and Change in Southeast Alaska. USFS PNW Research Sta.

a bust as – one after the other – the village Native corporations exhausted their old-growth forestlands and the regional corporation (Sealaska, the major landholder among the Native corporation) logged at a slower pace toward eventual exhaustion of its old-growth inventory.

In conclusion, Mr. Crafford’s claim is false that the decline from a few thousand timber industry jobs in 1990 to a few hundred today was caused by a “de-emphasis” by the Forest Service on timber sales. Instead, what occurred was a classic boom and bust, with the bust caused by a crashing global-market for dissolving pulp, the rapid exhaustion of the Native corporations’ standing timber, and the best and most profitable timber on the Tongass having been largely exhausted by the pulp mills.²⁸ The industry has for quite some time now been an insignificant segment of Southeast’s economy, and the economy has adjusted to that. Further, more harm than good would come from boosting the current industry’s size by giving the state or other entities additional old-growth forest to liquidate. Doing so would multiply the enduring cumulative impacts that the region must already contend with from decades of past intensive logging. Lasting harm would be caused to the otherwise future contributions to the regional economy by commercial fisheries, tourism and subsistence use.

8) *Crafford assertion: “[W]ith each successive iteration of planning and the NEPA review, it seems like the available timber base is whittled down further and further and further, to the point that so little is left” for the timber industry.*²⁹

What Mr. Crafford describes comes in large part from the industry itself whittling away at the non-renewable old-growth forest. This has been ongoing on a large scale in the region for six decades, across all land ownerships — the Tongass NF as well as lands owned by the University of Alaska, the Alaska Mental Health Trust, the State of Alaska, and eleven village, urban and regional Native corporations. All together, this still-continuing logging has already clearcut nearly 900,000 acres of old-growth forest. Moreover, in successive iterations of this logging, generally the best was taken, and then the best of the rest, and so on. The resource management and business models that drove this virtually ensured a bust for the industry, in addition to long-term damage to watersheds, wildlife and other economically important forest values. Devolving more Tongass National Forest land to state or other ownership will worsen this tragic outcome both economically and environmentally.³⁰ These models are unsustainable. We are long past the 1990s bust now, and should not create another one.

9) *Crafford assertion: Management of state forests is balanced, and management of federal forests needs a similar balanced approach.*³¹

My critiques above demonstrate that Alaska’s management of its state forests in Southeast Alaska falls far short of being balanced management. The fact of the matter is that Mr. Crafford has it backwards. The Forest Service’s management is much closer to being balanced than the state’s.

²⁸ The pulp mills “high-graded” the biggest, most valuable timber (which was also the best habitat), taking the best, then the best of the rest, etc. By the time the mills closed, this had greatly impacted their economics and is one reason they ended business in their competitive market.

²⁹ Time code 1:09:55.

³⁰ The full impact to wildlife takes 3-4 decades to become occur since it takes that long for the second growth forest canopy to close (creating a virtual desert on the forest floor). That is, much of the impact of logging as long ago as the mid-1980s is not yet fully realized – there is irrevocable impact debt.

³¹ Time code 17:06.

10) *Crafford assertion: Short of deeding-over federal forest land to the state or another entity, the other options (either the status quo or other approaches such as stewardship programs, good neighbor agreements, or states taking over (in trust) management of federal lands) would still leave in place the “hurdle” of federal environmental laws.*³²

Any of Mr. Crafford’s suggested changes to the status quo would be a disaster for the region’s forest environment and the social and economic structures that depend on it remaining functionally intact. Especially destructive would be the deeding of Tongass land to “the state or another entity.” But any of Mr. Crafford’s other non-status-quo suggestions would also be disastrous because Alaska’s Forest Practices and Resources Act — which governs logging on all non-federal lands — is very weak, the state is fiscally incapable of meeting FRPA’s weak requirements, and the state’s “one-voice” policy is antithetical to balanced, science-based management. Federal ownership of, and management authority over, the Tongass National Forest should be *fully* maintained.

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³² The premises here were put forth by Crafford at time code 1:03:22. Regarding those, Rep. LaMalfa then asked at time code 1:04:24, “So short of deeding the land over to state or the entity involved, you’re still going to be subject to the same hurdles, you feel?” Mr. Crafford answered, “Yes, sir” at 1:04:32.