



*Your Land.
Your Voice.*

* CELEBRATING 15 YEARS *

BOARD OF DIRECTORS

President Jimmy Carter
Honorary Chair
Georgia

Hon. Bob Mrazek
Chair Emeritus
New York

Tom Campion
Chair
Washington

Diane MacEachern
Vice Chair
Maryland

Doug Ray
Secretary
Oregon

Mike Matz
Treasurer
Colorado

Tim Bristol
Alaska

Hon. Tom Evans
Delaware

Ellen Ferguson
Washington

John Gilroy
New York

Bruce Gitlin
New York

Betsy Loyless
Washington, D.C.

Tim Mahoney
Virginia

John McComb
Washington, D.C.

Debbie S. Miller
Alaska

Richard Spener
Missouri

Mark Wolf-Armstrong
Washington

May 15, 2008

Chief Abigail Kimbell
USDA Forest Service
Attn: Appeals
Yates Building, 3CEN
201 14th St, SW
Washington, D.C. 20090-6090
Email: appeals-chief@fs.fed.us

Re: Notice of Appeal

Dear Chief Kimbell:

The following is a Notice of Appeal filed pursuant to 36 CFR part 217, objecting to the Record of Decision (ROD) for the Amended Land and Resource Management Plan of the Tongass National Forest (Forest Plan), signed by Regional Forester Dennis E. Bschor on January 23, 2008. The Amended Forest Plan is based on Alternative 6 in the Final Environmental Impact Statement (FEIS), as modified in the ROD.

Appellant Overview

The Alaska Wilderness League is a non-profit 501(c)(3) corporation founded in 1993 to further the protection of Alaska's public lands. The League's campaigns seek to preserve Alaska's wilderness by engaging citizens, sharing resources, collaborating with other organizations, educating the public, and providing a strong and constant voice for Alaska in the nation's capital. The League works at the federal level on a variety of issues affecting Alaska's wild land and waters including the Tongass National Forest, the Arctic National Wildlife Refuge, public lands in the Western Arctic and the arctic ocean, and BLM lands. The League is based in Washington, DC and has offices in Juneau and Anchorage, Alaska.

The League's rainforest program is focused on successfully gaining additional administrative and legislated protections for high-value, priority areas in the

Tongass identified through strong science and local knowledge of community priorities. The League's primary objectives are to:

- Secure the highest level of protection for intact watersheds with important biological, social and other values throughout the Tongass;
- Restore high-value watersheds previously damaged through logging and development; and
- Support a permanent transition of the timber program away from a reliance on old-growth logging within intact and core areas, to a more economical and sustainable program which relies primarily on young-growth and small diameter trees

Appeal Overview and Issues

A natural and national treasure, the Tongass in the coastal archipelago of southeast Alaska is the last great expanse of old growth rainforest in the world. After decades of logging which disproportionately targeted rare, big-tree forest stands¹, more than half of the highest value old-growth stands, which are most important for fish and wildlife, have been cut. The cumulative effects of past and projected logging and road building throughout Southeast Alaska substantially, and potentially irreversibly, reduce habitat diversity and increase risks of maintaining abundant populations of fish and wildlife well distributed throughout the Tongass.

Despite past impacts, the Tongass still boasts irreplaceable, intact watersheds and other core areas which are critical to maintaining the ecological integrity of the rainforest ecosystem. The focus of the Forest Plan and future management of the Forest should be on conserving and protecting what remains of these intact and core areas for today's and future generations.

Although the amended Forest Plan and Record of Decision establishes a new approach for managing the Forest through an adaptive management framework, overall the Forest Plan fails to provide durable and long-term protection for critical fish and wildlife habitat. As such, the revised Forest Plan is a high-risk strategy for maintaining ecosystem integrity, habitat diversity, and abundant populations of fish and wildlife well distributed across the Tongass.

The League's conservation priority areas on the Tongass are: 1) watersheds and sub-watershed core areas identified Audubon Alaska and The Nature Conservancy in their 2007 Conservation Assessment; 2) the 23 high-value fish producing watersheds identified and proposed for conservation status by Trout Unlimited; and 3) high-value community areas identified and tracked by SEACC and the Sitka Conservation Society. The League supports further protection of these conservation priorities within each biogeographic province on the Tongass.

Currently, phase 1 of the Forest Plan's adaptive management strategy defers impacts to many of the intact watersheds identified as the League's conservation priorities, but these same watersheds are at risk in later phases. Additionally, many of the core areas of biological values in the developed watersheds are scheduled for development in Phase 1 and most will be developed in later phases of the Forest Plan. As a result of the projected logging in conservation priority watersheds and sub-watershed core areas, the League believes the Forest Plan inadequately

¹"Past harvest on the Tongass has disproportionately targeted the larger POG types. Early logging in particular, especially prior to the 1990s, extensively harvested the larger tree types." (FEIS, page 3-149).

addresses environmental and conservation needs in Southeast Alaska. Although we recognize the timber industry does and should play a role in the local economy, the Forest Plan overreaches and allocates more lands than necessary to adequately accommodate the current industry.

Additionally, the League finds fault with the Forest Service's decision to not recommend any new Wilderness areas on the Tongass. Significant analysis and ranking systems, including the Forest Service's Wilderness Attribute Rating System (WARS), have identified watersheds with high biological value. The failure to establish Wilderness recommendations based on the identified lists of high priority areas while using the same rankings to tier development² is a failing of the Forest Plan.

Conclusion and Relief Requested

The League advocates for ensuring the ecological integrity of the Tongass over the long-term. The extensive loss of habitat and increased habitat fragmentation which has already occurred in Southeast Alaska, combined with the direction of the amended Forest Plan, significantly increases the risk to irreplaceable lands in the Tongass.

To meet the conservation needs of, and eliminate or significantly reduce the risks to, the Tongass Forest, the League seeks relief through the following modifications to the Amended Forest Plan:

- Maintain the ecological integrity of the Tongass and better meet community and subsistence needs by removing conservation priority areas (as outlined previously) from development LUDs and otherwise establish conservation status including restoration of previously logged and roaded areas.
- Recommend new Wilderness designations to intact watersheds which have been identified by agency and outside sources as those containing the highest fish and wildlife habitat values.
- Allocate to timber development lands outside of conservation priority areas where the current timber industry can operate sustainably and economically off of the existing road network in previously impacted watersheds and begin a permanent transition away from a reliance on old-growth harvest to a program focused on second-growth and small diameter trees.

AWL also incorporates by reference all of the points made in the appeals filed by Audubon Alaska and Trout Unlimited.

Sincerely,



Cindy Shogan
Executive Director

² The Forest Service took all of [the] rating systems and lists into account in developing the Final EIS and the Timber Sale Program Adaptive Management Strategy." (ROD, page 39)