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Tim Male, Tabitha Cale
Council on Environmental Quality
Executive Office of the President
736 Jackson Place NW
Washington, D.C., 20503

Mark Hazlegren
Office of Management and Budget
1600 Pennsylvania Avenue
Washington, D.C., 20503

Jonathan Pershing, Ph.D.
U.S. Department of State
Harry S Truman Building
2201 C Street, NW
Washington, D.C., U.S. 20503

Sent via emails: tmale@ceq.eop.gov, [Tabitha M Cale@ceq.eop.gov](mailto:Tabitha_M_Cale@ceq.eop.gov),
Mark_H_Hazlegren@omb.eop.gov; PershingJ@state.gov

Re: Tongass logging plan runs counter to U.S.-led Paris Climate Change Agreement

"The way the world's forests are managed, the way its land is used can make an enormous difference in whether we succeed in keeping the warming below the 2 degrees centigrade.. So it is not acceptable that the world today is losing nearly 50 football fields' worth of forest every minute. Our mandate is clear: We have to change course and we have to inspire that change in every corner of the globe." Secretary of State John Kerry at the Oslo REDD conference¹

We are writing to follow up on recent remarks of Secretary of State John Kerry in Oslo, Norway at the United Nations *REDD* conference on limiting emissions from global deforestation, as the U.S. prepares for its role in the historic Paris climate change agreements. We also would like to call your attention to the Tongass Final Environmental Impact Statement (FEIS) released today, as it directly conflicts with the Administration's climate change commitments nationally and globally. We are attaching for your review a new analysis conducted by Mater Ltd. using FOIA data from the Forest Service and field data collected to verify independent GIS timber volume projections for second growth that conflict with Forest Service transition estimates and were repeatedly dismissed by the agency in its environmental impact assessments. Specifically, as noted in the Mater analysis, by 2020 there will be more than enough second growth volume to meet the transition volume targets of the Forest Service without logging old growth for another 16 years as proposed by the agency.

¹<http://www.state.gov/secretary/remarks/2016/06/258522.htm>

We applaud Secretary Kerry's astute proclamation about the importance of forests as carbon sinks in preventing the world from reaching the catastrophic 2° C threshold. While it is vital to make these pronouncements on an international stage, it is even more important to follow them with specific policies that protect forest carbon here at home. Using Secretary Kerry's football field analogy, the Tongass proposes to clearcut the equivalent of over 2,439 football fields of old-growth rainforest annually, with most of this occurring in a 16-year timespan, the equivalent of about 7 football fields every day initially!

We have expressed concerns that the Tongass was ignoring CEQ's draft CO₂ emissions guidelines for selecting alternatives with the least emissions from clear-cutting old-growth rainforest in the nation's most carbon dense forest². The Tongass National Forest also has refused to collaborate on a project that we and our partners proposed with participation of an Alaska mill (Good Faith Lumber) that agreed to process second growth logs using advanced milling technologies and second growth inventories uniquely provided by our project. The agency has gone to the extremes of even blocking potential project funding from a private foundation that was turned away when the agency said it would not be a willing participant, despite a request from Good Faith Lumber. The Forest Service continues to slow-walk a transition that because of economic uncertainties that would have been solved by our projects, now faces the specter of congressional intervention from Senator Murkowski and Congressman Young to stop the transition unless the economic feasibility of second growth is clearly demonstrated, the precise basis for the project that we proposed.

The Tongass FEIS represents major coordination problems among agencies, particularly those responsible for the Administration's climate policies. We are requesting that you intervene in two ways in order to bring the Tongass into compliance with the Administration's climate change directives:

- First, we believe the Tongass has not presented a reasonable range of alternatives for reducing logging emissions or transitioning swiftly despite the second growth volume demonstrated in our project, dismissing without adequate analysis our alternative in both the DEIS and FEIS, ignoring the recent inventories and estimates that we provided. Second growth logging under our proposal would emit far less emissions than the agencies' preferred alternative.
- Second, we believe the failure to transition rapidly on the Tongass, when second growth supply will more than adequately meet the agencies' estimated timber targets, requires presidential action to redirect the Forest Service to transition quickly in the agencies' final Record of Decision.

In addition to the above points, we would like to call your attention a recent study of the Tongass timber program compared to ecosystem service values. The authors³ concluded that the Tongass was the "*most socially inefficient timber program in the U.S.*" This is largely because stumpage receipts to the U.S. treasure exceed costs of the sale program by a factor of 15. That is not only are costs of the timber program passed on to the American taxpayer, but ecosystem services like carbon, recreation, fisheries,

²<http://forestlegacies.org/programs/tongass-rainforest/1272-tongass-rainforest-is-alaskas-first-line-of-climate-change-defense-2>

³Hjerpe, E.E., and A. Hussain. 2016. Willingness to pay for ecosystem conservation in Alaska's Tongass National Forest: a choice modeling study. *Ecology and Society* 21:8 <http://dx.doi.org/10.5751/ES-08122-210208>

and wildlife are devalued. This type of valuation of ecosystem services is almost never considered in forest planning, and it should be especially in the context of financial inefficiencies in the Tongass logging program.

“This is as good of a signpost as any when it comes to the impacts of climate change.” President Obama during his September 2015 tour to Alaska glaciers.

We believe that the time is now for the Forest Service and Tongass to make an historic commitment, demonstrating the type of leadership and action to be taken by all global partners in our mutual pursuit of arresting climate change swiftly. No other national forest comes close to the carbon stored on the Tongass, which is sequestering ~8% of the nation’s annual emissions and storing carbon long-term in old-growth rainforests. Additionally, no other national forest clearcuts old growth on an industrial scale; thus, the Tongass remains out-of-step with national forests that have already transitioned to low controversial forms of logging (e.g., Siuslaw National Forest). To miss this unique legacy moment to lead on climate change in Alaska (one of the most striking signposts on climate change), demonstrates to the world that the U.S. is unwilling to protect its own carbon sink.

Sincerely,



Dominick A. DellaSala, Ph.D.
Chief Scientist, President