

**American Fisheries Society \* American Ornithologists' Union \* American Society of Mammalogists \* Ecological Society of America \* Pacific Seabird Group \* Society for Conservation Biology \* The Wildlife Society**

January 20, 2015

Secretary Tom Vilsack  
U.S. Department of Agriculture  
1400 Independence Avenue SW Washington, DC 20250

**Re: Old-growth logging transition on the Tongass National Forest**

Dear Secretary Vilsack:

As the nation's premiere scientific societies engaged in studies of fish, wildlife, ecology, and conservation, we are writing to express our full support for an accelerated transition away from clearcut logging of old-growth forests on the Tongass National Forest, as expressed in your July 2013 transition memo and the related May 27, 2014 Federal Register Notice of Intent "to conserve the Tongass National Forest [the agency] must speed the transition away from old-growth timber harvesting."

We believe this transition needs to be a central focus of the Forest Service's amendments to the Tongass National Forest Land Management Plan of 2008. This amendment is in order to conserve the old-growth forests and support fish, wildlife, and the integrity of the ecosystem in the region.

At 16.8 million acres, the Tongass is the nation's largest national forest. It is also one of the world's last relatively intact temperate rainforests.<sup>1</sup> The Tongass supports critical spawning and rearing habitat for five species of Pacific salmon plus steelhead and supports one of the Pacific's most significant salmon fisheries. Salmon are a major component of the productivity of temperate rainforest systems as they contribute substantial inputs of marine nutrients into freshwater and terrestrial systems, thereby strengthening the biological and ecological linkages between marine, freshwater, and terrestrial ecosystems. Past clearcutting has reduced large woody debris in streams—key salmon habitat—and future clearcutting of old growth increases risks of erosion in streams.

The Tongass' 5.4 million acres of productive old-growth forest provides habitat for important species like Sitka black-tailed deer and some of the highest-density populations of brown bears, bald eagles, northern goshawks, and marbled murrelets remaining in North America. New analyses within the Alexander Archipelago are uncovering an increasing number of endemic species, subspecies, and populations of mammals, birds, arthropods and other organisms, including the Alexander Archipelago wolf (*C.*

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<sup>1</sup> DellaSala, D.A. 2011. Temperate and boreal rainforests of the world: ecology and conservation. Island Press: Washington, D.C.

*lupus ligoni*), which is being considered for listing by the U.S. Fish and Wildlife Service.<sup>2</sup> Additionally, a number of Tongass wildlife and fish species closely associated with old-growth forests are vital to the subsistence, tourism, and fisheries-based economies of the region.<sup>3</sup> Already these sectors provide more local jobs than does timber harvesting.

Old-growth forests are a rare and diminishing resource throughout the world. Old growth provides valuable habitats for many species of plants, animals, and fungi and represents an important component of our nation's ecological heritage. Restoration after logging is expensive and can only re-establish certain elements of old growth habitats. Because it takes centuries for forests to develop fully, the ecological characteristics of old growth habitats, once clearcut, are essentially lost forever. The Tongass is the only national forest in the United States where clearcut logging of old growth still occurs. Although the Tongass Forest still has substantial old growth, the last 60 years of industrial logging has targeted the rarest stands of large-tree old growth, thus reducing the highest-volume contiguous old growth by over 60 percent.<sup>4</sup> These large-tree old-growth stands, which cover less than five percent of the Tongass, are among the most valuable habitats for many plants and animals.

With climate change and ongoing logging on both federal and nonfederal lands, the Tongass reserve network urgently needs enhanced protection of its remaining old-growth forests. Transitioning out of clearcut logging of old-growth—as has already happened in all other national forests—will help ensure sustainability of the Tongass Forest's fish and wildlife populations, world-class salmon fishery, and important subsistence and recreational uses, as well as its significant carbon storage and sequestration values<sup>5</sup>.

Furthermore, independent analysis indicates there will soon be sufficient second growth available to begin providing for a viable wood products industry in this region<sup>6</sup>. Unfortunately, the managers of the Tongass National Forest continue to advance controversial old-growth logging proposals that generate further risk to important forest values. In addition, since logging contracts on the Tongass return to the Forest Service

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<sup>2</sup> Cook, J.A. and S.O. MacDonald. 2013. Island life: coming to grips with the insular nature of southeast Alaska and adjoining coastal British Columbia. Pp. 19-42 In G.H Orians and J.W. Schoen (eds), North Pacific Temperate Rainforests Ecology and Conservation. University of Washington Press: Seattle, WA.

<sup>3</sup> Crone, L.K., and J.R. Mehrkens. 2013. Indigenous and commercial uses of the natural resources of the North Pacific Rainforest with a focus on southeast Alaska and Haida Gwaii. Pp. 89-126 In G.H Orians and J.W. Schoen (eds), North Pacific Temperate Rainforests Ecology and Conservation. University of Washington Press: Seattle, WA.

<sup>4</sup> Albert D. and J. Schoen. 2013. Use of historical logging patterns to identify disproportionately logged ecosystems within temperate rainforests of southeastern Alaska. *Conservation Biology* 27:774-784.

<sup>5</sup> Leighty, W.W. et al. 2006. Effects of management on carbon sequestration in forest biomass in southeast Alaska. *Ecosystems* 9:1051-1065.

<sup>6</sup> Mater, Ltd. 2014. Transitioning to a second growth strategy in southeast Alaska (POW region). Mater report based on 2014 GIS results. [www.databasin.org](http://www.databasin.org)

only a small fraction of its expenses in administering timber sales, continuing to log old growth imposes a high cost to U.S. taxpayers.<sup>7</sup>

The Tongass National Forest has the greatest abundance of old growth remaining in the nation. Managing for its old-growth forests, carbon stores, and fish and wildlife populations, would provide an example to the world of the administration's commitment to climate change remediation as well as assure that the Tongass region will continue to provide robust natural resources for future generations. For these reasons, we request that you (1) provide additional guidance to the Forest Service to end clearcut logging of old-growth forests during the forest plan amendment process, and (2) ensure that the timber industries' transition to second growth is completed as rapidly as possible, ideally within the next three years.

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cc: President Barack Obama  
Undersecretary Robert Bonnie  
Regional Forester Beth Pendleton  
Tongass Forest Supervisor Forrest Cole  
CEQ Advisor Michael Boots  
Jason Anderson & Lynn Jungwirth, Co-Chairs Tongass Advisor Committee

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<sup>7</sup> Headwaters Economics. 2014. Tongass National Forest and the transition framework. <http://headwaterseconomics.org/land/reports/tongass>.