



Trout Unlimited:
*America's Leading
Coldwater Fisheries
Conservation
Organization*



Sitka Conservation Society
*Protecting the natural
environment of the Tongass while
supporting the development of
sustainable communities in
Southeast Alaska – Since 1967*

July 18, 2016

Robert Dalrymple,
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Attn: Wrangell Island Project

Dear Mr. Dalrymple,

Please accept these comments on the Wrangell Island Project Draft Environmental Impact Statement (DEIS) submitted on behalf of Trout Unlimited (TU) and the Sitka Conservation Society (SCS). We appreciate the opportunity to provide input in this process. TU has a long history of working collaboratively with the U.S. Forest Service (USFS) throughout the National Forest System, and both TU and SCS have enjoyed a lengthy and fruitful partnership with the USFS on the Tongass National Forest (Tongass). Both organizations are committed, through the investment of significant staff and financial resources, to protecting and restoring important fish, wildlife and water resources on the Tongass, and to ensuring the region's unique wild salmon resources continue to serve as the economic, cultural and spiritual backbone of Southeast Alaska.

TU is the nation's largest sportsman's organization dedicated to coldwater conservation with more than 1,000 members, and tens-of-thousands of additional supporters, in Alaska that are passionate anglers, lodge owners, fishing and hunting guides, and commercial fishermen, among other various other occupations. In addition to members in more remote parts of the state, TU has active chapters in Fairbanks, Anchorage and the Mat-Su, on the Kenai Peninsula, and in Juneau. TU members regularly hunt and fish on the Tongass for sport, commercial and subsistence purposes. Many of our members make their living from the forest's fish, wildlife and water resources.

SCS has been working to protect Southeast Alaska's quality of life and the Tongass National Forest since 1967. Based in Sitka, Alaska, SCS has more than 1,000 local members that use and depend on the natural resources the Tongass provides, and SCS is investing significant resources to ensure the Tongass is managed so these important resources continue to be available for future generations. SCS is committed to the conservation of wilderness areas and to the sustainable development of Southeast Alaska's natural resources. SCS' Executive Director, Andrew Thoms, served on the Tongass Advisory Committee (TAC).

The Wrangell Island Project has undergone numerous iterations in recent years. As currently envisioned in the DEIS preferred alternative, this project risks significant deleterious impacts to important fish and wildlife habitat, threatens to undermine the collaboratively-developed TAC recommendations and the on-going forest plan amendment, would further erode the public's trust in the USFS to make good on its promise for a meaningful transition, and comes at the expense of the region's economic base: the fishing and tourism industries. In particular, TU and SCS have the following concerns with the project and DEIS:

I. Logging or Road Building Activities Should not Occur within High-Value Habitat.

The Tongass is the nation's top salmon-producing forest. Sport, commercial and subsistence fishing of Tongass salmon contributes \$1 billion annually to the regional economy and accounts for 10% of Southeast Alaska's employment.¹ In addition to this, more than a million out-of-state visitors flock to the Tongass each year, contributing another \$1 billion annually and accounting for another 15% of regional employment.² Both of these industries, which are far and away the region's top sources of earnings and employment, rely entirely on in-tact fish and wildlife habitat, beautiful scenery, and untouched landscapes.

While stream buffers and other standards and guides provide some assurances against the most severe impacts to important fish, wildlife and water resources, they are inadequate to fully protect sensitive watersheds from serious and long-term impacts. As we have seen time and time again, development activities that appear relatively minor when considered in isolation can combine to have catastrophic impacts on local fisheries and fish-producing waters. Wrangell Island, in particular, has been the site of significant past logging and road building. With newly-proposed timber harvest and road building activities planned on top of and between past harvest units, impacts to important fish and wildlife resources will compound.

¹ TCW Economics, *Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska*, prepared for Trout Unlimited Alaska 16 (July 2010), available at <http://www.tu.org/sites/www.tu.org/files/documents/EconReportFull.pdf>. The number of jobs supported by salmon fishing and its economic contribution are likely to be even greater today than was indicated since these figures were calculated using data from 2007 and the economy and salmon prices have continued to increase in years since.

² McDowell Group, *Economic Impact of Visitors to Southeast Alaska 2010-11*, prepared for Alaska Wilderness League 1 (Aug 2012).

As was unanimously recognized by the TAC³ and various other organizations, certain watersheds are too important for their fish and wildlife values, are too vulnerable to impacts from development, and should be entirely off-limits to old-growth logging. These high-value areas include the Tongass 77 watersheds,⁴ conservation priority areas from the Audubon/TNC Ecoregional Assessment, Inventoried Roadless Areas, and Phase 2 and 3 areas from the 2008 Tongass Land and Resource Management Plan. Old-growth logging within these areas is incompatible with the intended use and desired conditions of the area, and therefore the USFS should take extra care to ensure no logging or road building activities are planned within these important and sensitive areas.

a. Logging and Road Building Should be Prohibited Within the Thoms Lake VCU.

In particular, no old-growth logging or road building activities should be planned within the Thoms Lake VCU (4790). This VCU contains two major and six minor anadromous fish-bearing streams, all of which are important to local fisheries. Thoms Creek is the most productive salmon stream on Wrangell Island, providing a diversity of lake, stream and estuary habitats, and supporting an important subsistence sockeye fishery. It also supports chum, coho and pink salmon, as well as steelhead, cutthroat trout and Dolly Varden. In addition to Thoms Creek, Skip, April, Bearing, Cinnamon, Haux, and another unnamed creek, all within the Thoms Lake VCU, also contribute significantly to the fishery. Beyond these fisheries values, the Thoms Lake VCU also contains significant wildlife values and hosts important winter deer habitat.⁵

All alternatives evaluated by the DEIS include timber units and road building within the Thoms Lake VCU. As currently envisioned, the preferred alternative proposes numerous units within the Thoms Lake VCU, including but not limited to units 624, 701, 704, 705, 710, 711, 720-22, 724, 725, 728, 731, 733, and 736. Additional units may exist within Thoms Lake that we could not identify due to the limited maps made available in the DEIS. According to the unit cards, these units account for roughly 5.4 mmbf from 442 acres in the preferred alternative, which is a small fraction of the 65 mmbf contemplated in the preferred alternative. Yet, harvesting old-growth timber from these units poses serious risks to nearby streams and important fish and wildlife habitat, and directly conflicts with the recommendations of the TAC and the proposed forest plan amendment.

³ Tongass Advisory Committee, *Tongass Advisory Committee Draft Recommendations*, 12 (May 2015), available at <http://www.merid.org/~media/Files/Projects/tongass/TAC%20Recommendations%20Final%20Report-formatted.pdf>, hereinafter TAC Recommendations.

⁴ For a high-resolution map and list of the VCUs comprising the Tongass 77, see Trout Unlimited, *The Tongass 77 Priority Salmon Watersheds* (July 2015), available at http://www.americansalmonforest.org/uploads/3/9/0/1/39018435/salmon_proposal_t77_labeled_21jul2015nomargin.jpg.

⁵ See U.S. Forest Service, *Wrangell Island Project Draft Environmental Impact Statement* 81 (May 2016), available at http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/75452_FSPLT3_3084410.pdf, hereinafter Wrangell DEIS.

Because of the important fish and wildlife values of the Thoms Lake VCU, the great importance of the fishing and tourism industries that depend on these resources, and the broad recognition by the TAC and others of the need to protect fish and wildlife resources in high-value habitat, the USFS should adopt an alternative that maximizes protections for fish and wildlife while eliminating altogether logging and road building activities from high-value areas such as the Thoms Lake VCU. Protecting Thoms Lake from logging and road building activities of the Wrangell Island Project will help ensure the project does not come at the expense of our most important fish and wildlife habitat.

b. Logging and Road Building Should be Prohibited Within Roadless Areas.

Roadless Areas are hugely important for their fish and wildlife values, and for providing opportunities for solitude and remote primitive and wild recreation. Due to these important and widely-recognized values, the Roadless Rule generally prohibits road construction or logging in Inventoried Roadless Areas (IRAs).⁶ Consistent with this, the TAC recommended that no old-growth bridge timber should be sourced from IRAs⁷ and at various times the Secretary of Agriculture has reserved decision-making authority over timber sale activities in IRAs on the Tongass.⁸

The DEIS states that “all timber harvest and road building activities would be located outside any existing 2001 Inventoried Roadless Areas.”⁹ However, the 2001 inventory by itself is an incomplete inventory and the USFS must also take into account the 2003 Supplemental Environmental Impact Statement that expanded the Tongass roadless area inventory from 9.4 million acres to 9.6 million acres.¹⁰ The DEIS identifies the North Wrangell IRA as encompassing only the northern-portion of the block of Forest Service land north of the 6259 Road.¹¹ However, nearly the entire block of USFS land north of the 6250 Road is Roadless and should be off-limits to logging and road construction.¹²

While all the action alternatives considered by the DEIS improperly contemplate logging within the North Wrangell IRA, the preferred alternative is especially egregious with Units 524 and 955-70 all occurring within the North Wrangell IRA. All of these units, and any others, that are sited within an IRA should be omitted from consideration so the final project can be brought into compliance with the Roadless Rule.

⁶ See 36 C.F.R. § 294.11-12.

⁷ TAC Recommendations at 12.

⁸ Secretary’s Memorandum 1042-154, *Authority to Approve Road Construction and Timber Harvesting in Certain Lands Administered by the Forest Service* (May 2009); Secretary’s Memorandum 1042-155, *Authority to Approve Road Construction and Timber Harvesting in Certain Lands Administered by the Forest Service* (May 2010); Secretary’s Memorandum 1042-156, *Authority to Approve Road Construction and Timber Harvesting in Certain Lands Administered by the Forest Service* (May 2011).

⁹ See Wrangell DEIS at 213.

¹⁰ See U.S. Forest Service, *Final Supplemental Environmental Impact Statement Roadless Area Evaluation for Wilderness Recommendations* 1-7 (Feb 2003).

¹¹ See Wrangell DEIS at 58.

¹² See U.S. Forest Service, *Roadless Area Inventory Tongass National Forest Land Management Plan Revision 2003* (Jan 2003).

II. Timber Planning must be done at an Appropriate Scale.

The DEIS provides various statements about the purpose and need for the project, including: (1) “to support the local and regional economies of Southeast Alaska;” (2) “to seek to provide a supply of timber . . . that meets market demand;” (3) “to restore and improve forest resources to a condition where they provide increased benefits to society;” and (4) to “help provide a reliable, long-term supply of ‘bridge’ timber that would support local jobs and facilitate the industry transition to a sustainable wood product industry based on young-growth management.”¹³ However, various issues chronic to timber planning on the Tongass undermine the USFS’ ability to satisfy these purposes and needs with the Wrangell Island Project.

a. The Wrangell Timber Sale Undermines the Local Economy.

Timber planning too often comes at the expense of the region’s economic base of fisheries and tourism, and the Wrangell Island timber sale is no different. Once-productive salmon streams no longer support abundant salmon runs and ample wildlife populations when clearcut logging disrupts the recruitment of large-woody debris, erosion overburdens nearby streambeds, or road-stream crossings cut off important spawning or rearing habitat. Tourists and recreationists don’t travel to the Tongass to see and hike through large swaths of clearcut lands; they come to take in its scenic beauty and in-tact landscapes. The Forest Service has identified roughly 65 watersheds in need of significant restoration as a result of past logging and road-building activities and estimates it will cost \$100 million to address the backlog of unmet watershed restoration needs.¹⁴ As currently envisioned, the Wrangell Island timber sale will create new restoration needs and further harm the region’s base in fisheries and tourism.

As discussed above, fishing and tourism are the mainstays of Southeast Alaska’s economy. These industries—which have their foundation in healthy watersheds, in-tact fish and wildlife habitat, natural scenic beauty and untouched landscapes—depend heavily on the Tongass National Forest, which accounts for roughly 80% of the region’s land base and produces 79% of the regional salmon catch.¹⁵

Fishing and tourism far outpace other private-sector sources of employment and earnings, and provide a steady and reliable source of employment and earnings for many Southeast Alaska communities. Despite decreases in Southeast Alaska’s timber industry, Southeast Alaska’s population increased 7 percent from 2000 to 2012 and personal income

¹³ See Wrangell DEIS at v.

¹⁴ USDA, *Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013*, R10-MB-734 at 11 (Nov. 2011).

¹⁵ U.S. Forest Service, *Tongass Salmon Factsheet 1* (Jun 2013), available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5408056.pdf.

increased by 17 percent over the same period.¹⁶ Per capita income for Southeast Alaskans outpaces statewide and national averages while unemployment rates remain lower than statewide or national averages.¹⁷ Southeast Alaska's economy remains strong, and is buoyed by its healthy fish and wildlife habitat, productive salmon streams and scenic beauty. Managing the Tongass with fish, wildlife and visitor services at the forefront is the key to ensuring local communities and economies are strong and stable.

In order to support Southeast Alaska's rural communities and be responsive to the needs of the region, the Forest Service should seek ways to improve protections for important fish and wildlife habitat and enhance visitor services. At the same time, instead of continuing to offer large old-growth timber sales that undermine the region's job-producing industries, causes unnecessary and irreparable harm to important fish and wildlife habitat, and is a legacy program that would not exist if not for massive taxpayer subsidy, the Wrangell Island Project should be redesigned with the fishing and tourism industries at the forefront and to in every way possible avoid and minimize impacts to fish and wildlife habitat. Instead of designing the project as a large sale for export markets, the project should be scaled back and reconfigured to meet the needs of local small mills with domestic processing and manufacturing.

When evaluating the benefits from forest lands to society, the USFS places far too much emphasis on traditional extractive resources that too often are export based while largely ignoring benefits from fish, wildlife and water resources. As discussed above, by far the most valuable activity occurring on the Tongass is derived from intact fish and wildlife habitat. This is true throughout the country, but is especially relevant in Southeast Alaska and on Wrangell Island where the Tongass comprises such a majority of the land base. Southeast Alaska's timber industry pales in comparison to the region's fishing and tourism industries. Maximizing the benefits from the Tongass to the public requires the USFS to manage the Tongass in a way that keeps fish and wildlife at the forefront.

b. The USFS Overestimates Market Demand for Tongass Timber while Neglecting Small Mills and Local Processing.

The USFS consistently and artificially overestimates market demand for Tongass timber while failing to design timber sales that accommodate local mills and local processing. Too often, mill capacity is confused for market demand without accounting for the massive subsidies and long-term contracts that built up the Southeast Alaska timber industry, the on-going subsidy required for its maintenance today, or other economic and social factors that have led to the Tongass timber industry's steady decline in recent decades. This overestimation of market demand causes the USFS to consistently and inappropriately overinflate the size of its timber sales in an effort to maintain a massive shelf volume of timber.

¹⁶ U.S. Forest Service, *Final Environmental Impact Statement Plan Amendment 3-478 to 479* (Jun 2016), available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd507717.pdf, hereinafter Amendment FEIS.

¹⁷ *Id.* at 3-479.

At the same time, motivated by a desire to satisfy inflated demand estimates, the USFS designs projects that rely on export markets without providing a reliable and consistent supply for small mills that employ local processing and manufacturing. Properly scaled and appropriately placed timber sales will continue to evade the USFS on the Tongass so long as it continues to promote export over local processing and futilely chase artificially inflated market demand estimates that cannot be met.

A true estimate of market demand must be expressed as a function of price, not as a fixed value. As price increases or decreases, demand will move in the inverse direction. As has been well documented, the Tongass timber program operates at tremendous financial loss to the Forest Service and federal taxpayers.¹⁸ Over a five year period from 2009 to 2013, the Forest Service experienced a net loss of \$713 for every thousand board-feet of Tongass timber sold and more than \$20 million annually.¹⁹ However, timber demand estimates fail to account for this massive subsidy, which if passed on to the timber purchaser would certainly result in less demand for Tongass timber. Other forest users, including tour businesses, outfitters and guides, often are required by the Forest Service to cover costs of NEPA, trail maintenance, or other related staff costs—costs not borne by the Southeast Alaska timber industry and not fully accounted for in USFS market demand estimates.

In order to better serve the needs of Southeast Alaskans and the American public, the Forest Service must bring management of the Tongass more in-line with what is socially and ecologically acceptable. Rapidly ending the planning and sale of large-scale old-growth timber sales on the Tongass will reduce conflict and litigation, protect important fish and wildlife habitat, and help promote stable and strong local economy and communities. Designing reasonably scaled timber sales that cater to local processors and local demand will help stabilize timber industry employment while also conserving valuable old-growth forest. The Forest Service should publish a true market demand analysis that expresses demand for Tongass timber as a function of price, end the outdated practice of heavily subsidizing large-scale old-growth timber sales, and seek to meet the demand that exists when purchasers are required to bear the full costs of timber sale planning and administration, environmental review, and restoration.

c. The Wrangell Sale Undermines a Meaningful Transition.

In many regards, Southeast Alaska has already transitioned. Logging and milling of Tongass timber supports very few private sector jobs.²⁰ Even when timber from private and state lands is included, the timber industry in Southeast Alaska still accounts for just a few hundred jobs.²¹ It is time for the Forest Service to catch up with the rest of the region and shift its Tongass timber program to one that plans and implements appropriately-scaled timber sales

¹⁸ Headwaters Economics, *The Tongass National Forest and the Transition Framework: A New Path Forward* at 5 (Nov 2014).

¹⁹ *Id.*

²⁰ Amendment FEIS at 3-480.

²¹ Amendment FEIS at 3-482.

that support the region's small mills and encourage local manufacturing of young-growth forest products.

The past 60 years of industrial logging has targeted the rarest and most productive stands of large-tree old-growth forest on the Tongass, thus reducing the highest-volume contiguous old growth by 66 percent forest-wide.²² This large-tree old-growth forest, which historically covers less than five percent of the Tongass, is among the most valuable habitat for fish and wildlife. The overwhelming weight of the scientific community recognizes the extraordinary value of the remaining big-tree old-growth and has repeatedly called on the Forest Service to speed up the transition and end its old-growth timber sale program.²³

While the forest products industry plays an important role in Southeast Alaska, recent old-growth timber sales have undercut the Tongass transition, eroded public confidence and trust in the USFS, and served as unnecessary obstacles to the creation of a sustainable timber industry with local manufacturing in the Tongass. Old-growth sales going back to the Log Jam timber sale, if not before, have been sold to the public as bridge timber and as a way to encourage the industry to transition. However, instead of offering a limited supply of old-growth timber in a way that prudently meters it out over time, the USFS appears to be trying to maximize the volume of old-growth timber it offers in each sale while continually developing new sales to offer out in the future. Rather than encouraging investment in transition technologies and entrepreneurship within the Tongass timber industry, this scheme encourages the timber industry to dig in its heels against the tides of change and to cut as much as possible as fast as possible with the assurance that future timber sale planning will provide new, highly-subsidized old-growth timber volume.

The Wrangell Island timber sale is no different. It eschews opportunities with local mills and local timber processors in favor of a large, export-based timber sale that caters to off-island purchasers. It also, curiously, fails to consider any alternative with a positive advertising rate²⁴ and is inconsistent with the on-going forest plan amendment,²⁵ both of which make it impossible to know what the project may look like once it's implemented and more difficult to provide meaningful comment. Presumably, the USFS will cherry pick the most valuable timber units for sale from whatever alternative is chosen, excluding the remaining low-value units, but

²² Albert and Schoen 2013.

²³ See Jack Ward Thomas and Mike Dombeck, Seattle Times Op Ed, Declare harvest of old-growth off-limits and move on (Aug 23, 2003); Letter to the President by 78 North American Scientists (lead signatories were Jack Ward Thomas and Mike Dombeck) calling for a national old growth policy to protect the remaining old growth on national forest lands throughout the US (June 25, 2014); Letter to Secretary Vilsack from 200+ North American Scientists urging a quick transition out of old-growth logging on the Tongass National Forest (October 15, 2014); Joint Society letter to Secretary Vilsack from American Fisheries Society (AK Chapter), American Ornithologist's Union, American Society of Mammalogists, Ecological Society of America, Pacific Seabird Group, Society for Conservation Biology, The Wildlife Society (January 20, 2015).

²⁴ See Wrangell DEIS at 66.

²⁵ See U.S. Forest Service, R10-MB-769g, *Land and Resource Management Plan A-5* (Jun 2016), available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd507624.pdf.

based on the information available in the DEIS it is impossible to tell what the final project will look like upon implementation.

The Tongass is unique among our national forests because of its abundant and healthy wild salmon populations. These populations of wild salmon are the basis of the region's most valuable industries, support communities within the region both big and small, and attract visitors from all over the world. Thank you for the opportunity to participate in this planning process and for your careful consideration of these comments.

Sincerely,



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