



September 14, 2019

Carey Case, Project Leader  
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Via: [Carey.case@usda.gov](mailto:Carey.case@usda.gov) and  
<https://cara.ecosystem-management.org/Public/CommentInput?project=53098>

RE: Comments on the Central Tongass Project Draft Environmental Impact Statement

Dear Project Leader Case,

Please accept these comments submitted on behalf of Trout Unlimited (TU) to the Draft Environmental Impact Statement (DEIS) for the Central Tongass Project.

TU is the nation's largest sportsman's organization dedicated to coldwater conservation with more than 400 chapters and more than 140,000 active members nation-wide. TU has approximately 20,000 individual supporters in Alaska that are passionate anglers, lodge owners, fishing and hunting guides, and commercial fishermen, among other various occupations. In addition to members in more remote parts of the state, TU has active chapters in Juneau, on the Kenai Peninsula, in Anchorage and the Mat-SU, and in Fairbanks. Many of TU's members rely on the important fish, wildlife and water resources found on the Tongass for fishing, hunting, recreation, and for employment in related industries such as fishing and tourism. The Tongass National Forest is a popular destination for anglers and hunters because of its salmon and steelhead runs, cutthroat trout, Dolly Varden, Sitka Black-tail deer, black bear, unique karst features, numerous public use cabins, and growing visitor services.

TU has a long history of working collaboratively with the Forest Service and other stakeholders on the Tongass and elsewhere throughout the National Forest System. Partnering with the Forest Service is critical to TU and to its ability to fulfill its mission. TU is 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 foundation of Southeast Alaska.

We recognize the Forest Service for its efforts in recent years to advance the transition toward more sustainable forest management and away from large-scale old-growth logging as rapidly as possible. Improving protections for important fish and wildlife habitat, enhancing visitor services, and ending damaging and costly old-growth logging will enable the Forest Service to increase its support for Southeast Alaska's rural communities, respond to the needs of the region, and more efficiently allocate its limited budgetary and staff resources. By ending the practice of planning and offering large-scale and unsustainable old-growth timber sales—which undermine the region's largest job-producing industries, cause unnecessary and irreparable harm to important fish and wildlife habitat, and is an antiquated

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practice that would not exist if not for massive taxpayer subsidy—the Forest Service can establish a legacy of public service and support for local communities that will remain for generations to come.

### **I. Salmon and Recreation are the Tongass’ most Important Forest Products.**

The Tongass is the nation’s top salmon-producing forest, and is home to more salmon than all other national forests, combined. It’s many productive salmon streams, important fish and wildlife habitat, and beautiful scenery are the foundation for the local economy. Sport, commercial and subsistence fishing in Southeast Alaska contributes \$1 billion annually to the regional economy and accounts for 10% of Southeast Alaska’s employment.<sup>1</sup> In addition to this, more than a million out-of-state visitors flock to the Tongass each year, contributing another \$1 billion annually in economic activity and approximately 17% of jobs to the region.<sup>2</sup> The Southeast Alaska tourism industry is on track for a 30% increase in visitors to the region, bringing total visitation to 1.3 million individuals per year by 2019 and increasing demand for undeveloped, scenic places for recreation along with it. 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, which accounts for roughly 80% of the region’s land base and produces 79% of the regional salmon catch.<sup>3</sup>

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 Alaskan communities. Despite decreases in Southeast Alaska’s timber industry, Southeast Alaska’s population *increased* 7 percent from 2000 to 2012 and personal income *increased* by 17 percent over the same period.<sup>4</sup> Per capita income for Southeast Alaskans outpaces statewide and national averages while unemployment rates remain lower than statewide or national averages.<sup>5</sup> Southeast Alaska’s economy is buoyed by its healthy fish and wildlife habitat, productive salmon streams, and scenic beauty. Managing the Tongass with fish and wildlife and visitor services at the forefront is the key to ensuring local communities and economies are strong and stable.

### **II. The Forest Service Should Rapidly end Industrial-Scale Old-Growth Logging.**

In many regards, Southeast Alaska has already transitioned. Even when timber from private and state lands is included, the timber industry in Southeast Alaska accounts for just a few hundred jobs.<sup>6</sup> It is past time for the Forest Service to catch up with the rest of the region and the nation and shift its

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<sup>1</sup> 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.

<sup>2</sup> Rain Coast Data, *Southeast Alaska by the Numbers 2018*, prepared for Southeast Conference 4 (Sep 2018), available at

<http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20numbers%202018%20FINAL-compressed.pdf>.

<sup>3</sup> U.S. Forest Service, *Tongass Salmon Factsheet 1* (Jun 2013), available at [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5408056.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5408056.pdf).

<sup>4</sup> USDA, *Tongass Land and Resource Management Plan Final Environmental Impact Statement Plan Amendment*, R10-MB-769e at 3-478 (June 2016).

<sup>5</sup> *Id.* at 3-478 to 479.

<sup>6</sup> See Rain Coast Data, at 4.

Tongass timber program to one that plans and implements appropriately-scaled timber sales based on young-growth forest products that support the region's small mills and encourages local manufacturing.

While timber harvesting once played a historically important role in the economy of Southeast Alaska, recent old-growth timber sales have undercut the Tongass transition, eroded public confidence and trust in the Forest Service, and serve as unnecessary obstacles to the economic growth in the region. Old-growth sales going back to the Log Jam timber sale in 2009, if not before, have been sold to the public as "bridge timber" and as necessary to encourage the forest products industry to transition. However, instead of offering a limited supply of old-growth timber in a way that prudently meters out the remaining old-growth bridge volume over time, the Forest Service has too often maximized the volume of old-growth timber it offers in each sale while continually developing a new backlog of large-scale old-growth timber sales to offer out in the future. This scheme encourages the few remaining timber operators to dig in their 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.

Industrial old-growth timber sales too often come at the expense of the region's strong economic base of fisheries and tourism. Once-productive salmon streams no longer support abundant salmon runs and ample wildlife populations when unsustainable 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 land. They come to take in its scenic beauty and wild landscapes. The Forest Service has identified roughly 65 watersheds in need of significant restoration on the Tongass 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.<sup>7</sup> More than one-in-four jobs in Southeast Alaska are in either the fishing or tourism industries.<sup>8</sup> If management of the Tongass is to truly support the local and regional economy, it must do so with fishing and tourism at the forefront and to, in every way possible, avoid and minimize impacts to fish and wildlife habitat.

The past 60 years of industrial logging has targeted the rarest and most productive stands of large-tree old-growth forest, thus reducing the highest-volume contiguous old growth by 66 percent forest-wide.<sup>9</sup> On Prince of Wales Island, more than 94 percent of the contiguous large-tree old-growth stands have been logged since 1954.<sup>10</sup> 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

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<sup>7</sup> USDA, *Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013*, R10-MB-734 at 11 (Nov. 2011).

<sup>8</sup> See Rain Coast Data, at 4.

<sup>9</sup> Albert, D. M., and J. W. Schoen, *A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest* In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. eds J. W. Schoen, and E. Dovichin. Audubon Alaska and The Nature Conservancy (2007), available at <https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

<sup>10</sup> *Id.*

big-tree old-growth and has repeatedly called on the Forest Service to end its old-growth timber sale program.<sup>11</sup>

### **III. The Central Tongass Project Undermines the Transition.**

Despite economic, ecological and common-sense considerations all supporting an immediate end to industrial old-growth logging, the 2016 Amendment to the Tongass Land Management Plan established a 16-year transition period to ramp down old-growth logging. With the recent Prince of Wales Landscape Level Analysis (POW LLA), the Forest Service already has an abundant supply of old-growth volume that is NEPA-cleared and ready for sale to supply bridge timber during the remaining transition period. When timber from the POW LLA is combined with the old-growth timber volume planned in the Central Tongass Project, the Forest Service is planning more old-growth timber than is necessary for the remaining transition period, appears to be extending the transition timeline, and is discouraging the remaining timber operators from adapting and investing in new technologies. Instead of furthering a smooth transition, the Central Tongass Project is undermining it.

### **IV. Condition-based Management Violates NEPA and Fails to Provide Adequate Opportunity for Public Input.**

The Central Tongass Project will have significant negative impacts to the region's important fish and wildlife habitat and to the local economy. Logging another more than 150 mmbf of old-growth timber and 80 mmbf of young-growth timber from the project area risks disastrous and long-lasting impacts to important fish, wildlife and water resources. These risks and impacts compound when the historic impacts of logging and road building are taken into account, which reinforces the need for more appropriately-scaled timber sales designed for small operators, strict implementation of standards and guidelines, adherence to best management practices, as well as continual and rigorous monitoring of associated impacts to aquatic, wildlife and recreational resources. By relying on condition-based management, the Forest Service is failing to provide adequate notice to the public of what specific activities will take place on the ground, omitting essential information about where and how logging activities may occur, and denying the public the opportunity to be informed of all the details of the project and provide meaningful input to decision makers.

### **V. The Forest Service needs to Undertake a Study to Determine the Likely Impacts of Young-Growth Logging in High-Value Fish Watersheds, such as the Tongass 77, Before Planning Timber Harvesting or Road Building Activities in those Areas.**

In keeping with the 2016 forest plan, old-growth logging must not occur in Tongass 77 areas, roadless areas, or in TNC/Audubon Conservation Priority Areas. Local stakeholders, commercial operators, and the public at large have overwhelmingly voiced support for protecting these areas at

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<sup>11</sup> 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).

every opportunity. Protecting these high-value areas is a key component of the 2016 Forest Plan and a key recommendation unanimously adopted by the Tongass Advisory Committee (TAC).

The DEIS notes that some young-growth harvest is planned in Tongass 77 and TNC/Audubon Conservation Priority Area. As specified by the TAC in its final recommendations, the Forest Service must:

Identify where young growth timber projects, during the period of the transition, intersect with certain high-value fish watersheds. In these areas of intersection, conduct a timely scientific review to determine likely impacts to fish and wildlife habitat from timber harvest. If harvest is proposed in one of these watersheds, the Forest Service may apply additional standards or guidelines to mitigate risk to fish habitat.<sup>12</sup>

To be consistent with the TAC recommendations and the 2016 forest plan, the Forest Service must undertake a thorough scientific review to improve our understanding of how young growth harvest will impact fish and wildlife habitat before planning young-growth harvest in the Tongass 77. Based on the improved understanding gained through this additional scientific review, the Forest Service should then develop and adopt more stringent standards and guidelines for Tongass 77 areas that avoid and mitigate impacts to fish habitat. Among other issues that may be identified by Forest Service staff, new standards and guidelines should be developed to avoid and minimize road impacts, sedimentation and soil stability, large-woody debris recruitment, stream channelization and bank stability, and direct and indirect impacts to fish species across their life stages. Young growth harvest should only be planned within the Tongass 77 *after* the scientific review and adoption of new standards and guidelines. The Forest Service has provided no rationale or basis for its decision to disregard the TAC's recommendation and to move forward now with young-growth timber sales in the Tongass 77.

The Central Tongass Project includes plans for young-growth logging in three Tongass 77 areas on North Kuiu Island. These areas—Kadake Creek (VCU-4210), Port Camden (VCU-4200) and Security Bay (VCU-4000)—all have excellent fish-production values in addition to providing great opportunities for both guided and personal recreation. Some of the superlatives specific to each of these watersheds are as follows:

- Kadake Creek: Contains the highest amount of habitat and largest returns for coho, chum and pink salmon, as well as steelhead in the Kuiu Island biogeographic province. Kadake is surveyed as part of the Saginaw Bay pink salmon escapement index and pink returns number 60,000 fish annually with some years topping 90,000 fish. Kadake Creek received designation as one the top 19 fish-producing watersheds in Southeast Alaska by the Alaska Department of Fish and Game (ADFG) for its contributions to both sport and commercial fishing industries. The creek and Forest Service cabin are a prime destination for steelhead and coho fishermen and the watershed is an important subsistence location for residents of Kake. Several of Kadake Creek tributaries have undergone significant instream restoration work and investment.

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<sup>12</sup> Tongass Advisory Committee, *Tongass Advisory Committee Final Recommendations* at 4 (Dec. 2015), available at [http://www.merid.org/~media/Files/Projects/tongass/December%202015%20Meeting/Tongass%20Advisory%20Committee%20Final%20Recommendations\\_Dec%202015.pdf](http://www.merid.org/~media/Files/Projects/tongass/December%202015%20Meeting/Tongass%20Advisory%20Committee%20Final%20Recommendations_Dec%202015.pdf).

- Port Camden: This bay and associated watershed are a rich ecosystem. It is listed as one of 86 VCUs with the highest community-use value and as a primary salmon producer in the ADFG Tongass Fish and Wildlife Resource Assessment. There are ten major streams within the watershed, which have especially notable chum salmon production that contributes significantly to local commercial fisheries. Camden supports quality waterfowl hunting at the head of the bay and has a tradition of high subsistence use. It is a popular black bear-hunting area for both guided and non-guided sportsmen. A fish ladder was constructed on Slippery Creek by the ADFG.
- Security Bay: Fall Dog Creek, one of two large streams at the head of Security Bay, is unique when compared to streams of similar size on the islands of Southeast Alaska. In addition to having a salt chuck, it has a number of artesian springs in its bed that provide an upwelling of water into the stream and keep portions of it ice free late into the year. The ice-free conditions provide fall spawning habitat for a November run of chum salmon and protect the eggs during winter. The salt chuck at the head of Security Bay is known for high-quality waterfowl hunting. Three other small, anadromous fish-bearing streams flow into the shared estuary at the head of the inlet, and support small runs of chum, coho, and pink salmon. Dean Creek and Lookout Point Creek round out the anadromous streams in this VCU, and both have runs of coho, pink, and chum salmon, as well as Dolly Varden char, cutthroat, and steelhead. Listed as one of 86 VCUs with the highest community use value as well as a primary salmon producer in ADFG Tongass Fish and Wildlife Resource Assessment.

Given these substantial values, the Forest Service's failure to undertake a study on potential impacts of young-growth logging to fish and wildlife habitat as was recommended by the TAC, and past investments in restoration activities in the region, TU opposes any logging in these areas, or anywhere else in the Tongass 77.

#### **VI. The Forest Service Should Prioritize Riparian and In-stream Restoration.**

A large portion of the project area has been substantially roaded and logged over the past several decades. These activities have had serious adverse effects on many streams, rivers, lakes and riparian areas, and on the fish and wildlife that use these areas. Road densities are too high, deer population densities are too low, large woody debris is not being recruited at a level necessary to ensure continued productivity of important salmon streams, and many areas suffer from sedimentation and unnatural slope instability. Addressing these impacts should be the Forest Service's top priority.

#### **VII. The Forest Service must Address the Backlog of Road Maintenance Needs and Consider Alternatives that Avoid new Road Construction or Reconstruction.**

TU encourages the Forest Service to avoid new development activities that will impact salmon streams or cause them to exceed environmental thresholds identified in the Forest Plan. In addition to fish passage issues associated with stream crossings, logging roads can have serious negative impacts on important fish and wildlife habitat even where the roads do not intersect streams. Sedimentation, landslides, and increased traffic are just some of the potential impacts of logging roads—along with the significant and long-term costs to taxpayers of road construction and maintenance. Because of the serious negative impacts of roads and the extremely high cost to the tax-paying public, the Forest

Service should focus on addressing the existing backlog of road maintenance and pursue alternatives that do not rely on new logging roads.

#### **VIII. Conclusion.**

When evaluating the benefits from forest lands to society, the Forest Service is placing far too much emphasis on traditional extractive resources while largely ignoring benefits from fish, wildlife, recreation and water resources. As discussed above, by far the most valuable activities occurring on the Tongass are derived from intact fish and wildlife habitat and wild scenery. This is true throughout the National Forest System, but is especially relevant in Southeast Alaska where the Tongass comprises such a large portion of the land base. Southeast Alaska's remaining timber industry pales in comparison to the region's fishing and tourism industries. Maximizing the benefits from the Tongass to the public requires the Forest Service to manage the Tongass in a way that prioritizes its contributions in fish, wildlife and visitor services.

Rather than planning additional over-sized and costly timber sales that are unsustainable and detrimental to the long-term resiliency of the Tongass, the Forest Service should take this opportunity to diversify its timber program and offer a set of appropriately-scaled timber sales that sustainably manages timber lands, encourages new investment in technologies that will transition the forest products industry, and avoids highly-subsidized and unsustainable logging practices. Stewardship contracts should be avoided altogether except for where the underlying purpose of the contract is to improve ecological health and where timber harvest, if occurring at all, is only a very minor part of the on-the-ground activity and secondary to the ecological goals of the contract. Restoration of riparian and in-stream habitat, including activities to remedy fish passage past red pipes, should be a top priority and not contingent upon nearby timber harvest.

Thank you for the opportunity to provide input into this planning process. Please do not hesitate to contact me by email at [awilliams@tu.org](mailto:awilliams@tu.org) or by phone at 907.227.1590 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Austin Williams', written over a horizontal line.

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