



Sitka Conservation Society
Box 6533
Sitka, Alaska
99835
(907) 747-7509
info@sitkawild.org

*“Working to protect the
natural environment
of the Tongass,
and develop sustainable
communities in Southeast
Alaska – Since 1967”*

September 16, 2019

Carey Case, Project Leader
Petersburg Ranger District
P.O. Box 1328
Ketchikan, AK 99833
Via email: carey.case@usdoj.gov
Via web portal: [https://cara.ecosystem-
management.org/Public/CommentInput?Project=53098](https://cara.ecosystem-management.org/Public/CommentInput?Project=53098)

RE: Sitka Conservation Society DEIS Comments for the Central Tongass Project

These Central Tongass DEIS comments are written by the Sitka Conservation Society and represent the Board of Directors of the Society and our membership of over 1000 people who use, depend on, and care about the integrity of the Tongass National Forest. In these comments, we will speak to some of the big-picture policy concerns related to the management direction, investments, and staffing on the Tongass National Forest as a means to inform the agency on the local input regarding Tongass management. We will also address several project level concerns about the direction that the agency is taking with the proposed Central Tongass project.

Management Concerns

1. **Community Priorities:** The majority of comments in the scoping period reflected desires to improve recreation infrastructure and access, as well as access to and protection of subsistence resources including deer, moose, fish, berry picking sites, etc. The project reflects these priorities in that it proposes several recreation infrastructure projects and watershed restoration and improvement; however, it is ingenuous to imply to communities that these projects will actually happen when their feasibility is governed by budget controls and appropriations processes at a Congressional level, which has historically and in its present form been more concerned with the provision of timber resources on the Tongass than sustainable recreation management and watershed restoration (evidenced by declining appropriations for these activities over the past 15 years).
2. **Old Growth Timber Harvest:** Tongass management needs to move away from old growth timber harvest. We do not want to see continued large scale clearcutting of old growth habitat in this project. Old growth habitat is essential for the continued production of fish and wildlife, which contributes to our commercial fishing economy as well as our visitor industry. These industries provide a combined 25% of regional employment and income, and should not

have their economic contributions endangered by short-term, politically driven management of Tongass timber resources.

Project-Level Concerns

1. There are no unit cards for the project that detail site-specific road proposals and timber harvest. It is impossible to analyze the potential impacts on subsistence resource populations if we do not know where the harvest will be or how extensive it will be. Furthermore, subsistence hunters and fishers are unable to offer alternatives that could mitigate impacts to the land if they are unable to examine and evaluate the direct and cumulative effects of those impacts.
2. The Kake tribe claims their traditional territory on Kupreanof and Kuiu islands, as well as on Southern Admiralty Island and parts of the mainland near Farragut Bay. The Organized Village of Kake has repeatedly expressed opposition to the logging proposed on Kupreanof Island and northern Kuiu, as their lands recover from past clearcutting and degradation. The wishes of this community in regards to protecting these lands for their subsistence resources need to be honored, as rural, predominantly Alaska Native community members will be especially adversely affected by further timber harvest activities.
3. **Subsistence Harvest:** Kake residents depend on the subsistence harvest of deer, moose, seal, salmon, halibut and other groundfish, as well as a variety of berries and plants for their sustenance. Grocery stores in rural Alaska are cost-prohibitive and diets are necessarily supplemented with harvested food, both as a matter of cost as well as the fact that harvesting and living with the land is considered to be the Tlingit 'way of life'. Forest Service activities such as clearcut logging that pose adverse effects to the integrity and productivity of fish and wildlife habitat around the traditional harvesting territory of Kake stand to particularly target and reduce the food supply of a minority group in violation of NEPA.
4. **Cultural Identity and Practices:** As previously mentioned, the cultural identity of the Tlingit and Haida people living in Kake depends on the harvesting of traditional foods, as well as other traditional resources such as cedar bark. Yellow cedar die-off is occurring throughout Southeast Alaska due to root freeze and climate change, and these trees need to be conserved for cultural purposes. There should be no old growth timber harvest in areas where yellow cedar is present.
5. **Lack of specifics detrimental to the public process:** The lack of unit cards and site-specific information make it extremely difficult for the affected publics to provide feedback on this project and its effects on their wildlife habitat, recreation opportunities, and subsistence uses in any meaningful way. The Forest Service should rectify this difficulty by providing unit cards and site-specific activity information to the public before they proceed with issuing a final decision, and hold another commenting period so that the public is able to provide actual, meaningful input on these activities and the areas that they are proposed in.

Thank you for the opportunity to submit comments on this project.

Regards,

A handwritten signature in black ink, appearing to read "Andrew Thoms". The signature is fluid and cursive, with the first name "Andrew" and last name "Thoms" clearly distinguishable.

Andrew Thoms
Executive Director