

THE BOAT COMPANY/UNCruise ADVENTURES/LINDBLAD EXPEDITIONS

Shane Walker, District Ranger
Attn: South Revilla Integrated Resource Project
USDA Forest Service

October 19, 2020

Tongass National Forest, Ketchikan Misty Fjords Ranger District
3031 Tongass Avenue, Ketchikan, Alaska 99901

Submitted via: <https://cara.ecosystem-management.org/Public/CommentInput?Project=53477>

Via email to SM.FS.AtkmComments@usda.gov

Re: South Revilla Integrated Resource Project

Dear Mr. Walker,

I submit the following comments regarding the South Revilla Integrated Resource Project Draft Environmental Impact Statement (DEIS) on behalf of The Boat Company, Uncruise Adventures and Lindblad Expeditions. Our companies are part of Southeast Alaska's small cruise vessel fleet - a diverse group of overnight commercial passenger vessels including yachts and smaller motor vessels that carry between 6 and 250 passengers.¹ There are roughly thirty small cruise vessels carrying more than 20 passengers regularly operating in Southeast Alaska that operate along Southeast Alaska marine travel routes and some of which utilize marine waterways in the South Revilla project area.² The Forest Service manages most of the project's land area for timber uses, which minimizes opportunities for use from outfitters or guides.³ However, Carroll Inlet does include areas of identified high and moderate value scenery and has value as a scenic waterway used by small cruise vessels.⁴ For this reason, we request that you cease planning on the proposed project-specific Forest Plan amendment to lower scenic integrity objectives which will result in both larger and more visible clearcuts along marine Visual Priority Routes.⁵

Most of the views in Carroll Inlet and Thorne Arm waterways have "moderate" scenic integrity, with areas of "very high" and "low" scenic integrity.⁶ This means passengers on our cruise vessels can view slightly altered landscapes where clearcuts don't dominate the scene, intact, natural appearing landscapes, and some moderately altered landscapes where the clearcuts must blend with the surrounding landscape.⁷ The proposed amendment would create "very low" scenic integrity objectives throughout the project area.⁸ This means that scenery visible from marine waterways will deteriorate from existing conditions that provide scenic values to landscapes that "appear heavily altered."⁹ One of the major consequences will be that maximum clearcut sizes could increase from 5 to 10 acres to between 50 and 74 acres.¹⁰

¹ See Alaska Division of Economic Development. 2016. Trends and opportunities in Alaska's small cruise vessel market (hereinafter Alaska 2016 Small Cruise Market). Available at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd530432.pdf.

² *Id.* (identifying 24 active 20+ passenger capacity vessels in 2015); <http://uncruise-alaska.com/ships/s-s-legacy/>; <https://www.expeditions.com/why-us/our-fleet/national-geographic-quest/overview/>; <https://www.alaskandreamcruises.com/fleet/chichagof-dream> (showing recent vessels additions to the Southeast Alaska small cruise vessel fleet).

³ DEIS at 122.

⁴ See *id.* at Fig. 20.

⁵ *Id.* at v, 104.

⁶ *Id.*, Fig. 20.

⁷ *Id.* at 102; U.S. Forest Service. 2016. Tongass Land and Resource Management Plan at 4-58-4-60 ("Forest Plan").

⁸ DEIS at 107.

⁹ Forest Plan 4-56-4-60.

¹⁰ *Id.*

The Forest Plan FEIS recognizes that:

...demand for scenic quality can best be represented by the increase in tourist-related travel to the Tongass, as well as a heightened awareness and sensitivity of Alaskan residents to scenic resource values. These facts result in a strong indirect connection between scenic resource values and the economy of Southeast Alaska. For example, Southeast Alaska's Inside Passage is advertised and promoted by the Division of Tourism, cruise ship operators, and the Southeast Alaska Tourism Council. Their marketing strategy focuses on the scenery of the Tongass National Forest as a major attraction. The visitors to Southeast Alaska would, therefore, arrive with expectations and an image of the environment and scenery awaiting them. If current trends continue, demand for viewing scenic landscapes will increase.

...Lands adjacent to the Alaska Marine Highway, cruise ship routes, flight-seeing routes, high-use recreation areas, and other marine and land-based travel routes will be seen by more people, more frequently, and for greater duration.¹¹

It identifies Southeast Alaska's comparative advantage in the national and global economy in large part to include the region's "remarkable and unique combination of features including inland waterways with over 11,000 miles of shoreline, mountains, fiords, glaciers"¹² The Forest Plan FEIS anticipated rising visitor numbers due to increased demand for viewing scenic landscapes - a finding consistent with research showing that landscape quality generates real economic value.¹³ Predicted increases occurred prior to the pandemic, indicating that Alaska's popularity is growing - particularly southeast Alaska which hosts two-thirds of all state visitors, making it the most visited region of the state.¹⁴ The visitor products industry thrives in no small part because of the supply of scenery.¹⁵

The range of alternatives unreasonably aims at high volume timber sales with minimal mitigation of harms to scenery and wildlife habitat

Although the DEIS identifies various resources and socio-economic needs, the emphasis of the proposed action – Alternative 2 - is to implement a large timber sale.¹⁶ Alternative 2 seeks to maximize timber volume by offering to sell 70 million board feet (MMBF) of old growth and 22 MMBF of second growth.¹⁷ This alternative would destroy scenic values on 1,762 acres, or 28 percent of the project area, including areas visible from marine waterways such as Carroll Inlet and Thorne Arm.¹⁸ Alternative 3 would destroy scenic values in the same manner as Alternative 2 but would reduce impacts to wildlife relative to Alternative 2 by retaining uncut travel corridors and some winter deer habitat, reducing the sale offering to 60 MMBF of old-growth.¹⁹

Alternative 4 responds to the issue of scenic values by maintaining Forest Plan scenic integrity objectives and implementing more partial cuts.²⁰ The agency would still extract nearly the same amount of old-growth timber - 68 MMBF - from the same 5,115 acres of old-growth forest as Alternative 2.²¹ Alternative 4 also seeks to maximize timber harvest and will still place clearcuts and partial cuts

¹¹ U.S. Forest Service. 2016. Tongass Land and Resource Management Plan Final Environmental Impact Statement at 3-389-390. R10-MB-769e (hereinafter 2016 TLMP FEIS).

¹² *Id.* at 3-357.

¹³ Ahtikoski et al 2011.

¹⁴ <http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>

¹⁵ *Id.* at 3.

¹⁶ DEIS at 1-5.

¹⁷ *Id.* at 10.

¹⁸ *Id.* at 20.

¹⁹ *Id.*

²⁰ *Id.* at 22.

²¹ *Id.*

within areas of moderate scenic integrity objectives and other visible portions of marine waterways.²² This alternative does not respond to the need for scenic values but rather reduces them below the status quo. We suggest that an alternative aimed at scenic quality should recognize, as explained in the DEIS, that “[e]xisting scenic integrity changes over time, as some alterations may revegetate and begin to blend in with the surrounding landscape.”²³ An alternative aimed at scenery as a significant issue should allow existing clearcuts to fully recover while preventing any net loss of scenic value.

In other words, the range of alternatives in this DEIS does not reasonably respond to concerns with impacts to scenic values. There are three choices that provide large amounts of old-growth timber for sale, leaving the commenting public reviewing action alternatives with a bizarre choice between a more significant loss of wildlife habitat values, or larger, more visible clearcuts than allowed under current regulation. If you proceed with this project, substantially downscaled alternatives are necessary to respond to both wildlife and scenic values. We support the no-action alternative. We further wish to express serious concerns about the piecemeal approach to weakening Forest Plan scenic standards, and request that the DEIS do a better job explaining and displaying impacts to marine waterways.

The Forest Service should cease piecemeal planning on weakened scenery standards

A primary purpose of NEPA is to “assure for all Americans ... esthetically and culturally pleasing surroundings” and agencies must incorporate “the environmental design arts in planning and in decisionmaking.”²⁴ The Forest Plan recognizes that “[t]he outstanding scenery of the Forest is a major attraction for resident and non-resident recreation users.”²⁵ It identifies scenic desired conditions that include “desired landscape attributes ... envisioned for the Forest during the life of the Forest Plan (15 years) and specifies that the Forest Plan will guide future activities.”²⁶

Appendix F of the Forest Plan identifies Visual Priority Routes and Use Areas like Carroll Inlet where each Ranger District must emphasize scenery, such as routes utilized by cruise ships, ferries and private boaters. The Forest Plan desired condition for Visual Priority Travel Routes is that forest visitors, recreationists and others “will view a natural-appearing landscape.”²⁷ The Forest Plan scenery standard states that “[t]he long-term desired future scenic condition for a specific area is the maintenance of a scenic integrity level that is at least as high as the adopted [scenic integrity objective] for that area.” It is impossible, despite the claim in the DEIS, to weaken Forest Plan scenic objectives, standards, etc. “without compromising the Forest Plan’s goals, objectives and desired conditions.”²⁸

This is the now second time in roughly a year that the Forest Service has threatened to reduce scenic values in order to increase clearcut sizes/profit margin for timber companies. The Central Tongass Project similarly sought to make an additional 12,084 acres of clearcuts visible from multiple Forest Plan Visual Priority Routes and Use Areas that provide scenery to our clients throughout our cruise routes.²⁹ These piecemeal proposals to weaken scenery standards through a Forest Plan amendment are inconsistent with the agency’s own planning rule and NEPA. Plan amendments require “a preliminary identification of the need to change the plan” that may be based on a new assessment, a

²² *Id.* at 108 (Table 38), 114.

²³ *Id.* at 103.

²⁴ 42 U.S.C. § 4331(b)(2); § 4332(a).

²⁵ Forest Plan at 1-2, 2-1.

²⁶ *Id.* at 1-4.

²⁷ *Id.* at 3-103.

²⁸ DEIS at 7.

²⁹ USDA Forest Service. 2019. Central Tongass Project Draft Environmental Impact Statement Vol. 1 at 3-69-3-70. R10-MB-832a. U.S. Forest Service, Alaska Region.

monitoring report; or other documentation of new information, changed conditions, or changed circumstances.”³⁰

The DEIS provides no assessment, new information, changed conditions or changed circumstances to justify the proposed amendment. The Forest Service plans to determine that scenic integrity objectives have cost consequences that “unnecessarily affect the ability to produce economic timber sales” and believes that the Amendment is necessary because larger clearcuts and increased frequency of visible clearcuts will make the project more cost-effective for a prospective timber sale purchaser.³¹ In other words, the sole reason for compromising Scenic Integrity Objectives is a perceived “need” to modify the Forest Plan in order to “improve timber economics” – i.e. to reduce the potential for a deficit appraised timber sale.³² Neither deficit appraisals nor poor timber sale economics are changed conditions.

The Forest Service’s planning rule also requires that plan components make “contributions to social and economic sustainability considering social, cultural and economic conditions, sustainable recreation, including recreation settings, opportunities, access and scenic character, multiple uses and opportunities to connect people with nature.”³³ Indeed, planning rule provisions provide multiple instructions to account for aesthetic values and scenic character.³⁴ The weakening of Scenic Integrity Objectives appears is an unlawful, back door approach to removing standards and guidelines and other regulations intended to meet the agency’s multiple-use responsibilities.

The DEIS does not adequately explain or display impacts to marine waterways

We request that a revised DEIS do a better job of explaining impacts to marine waterways if you proceed with this project. NEPA’s purpose is to “help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore and enhance the environment.”³⁵ High quality information and accurate scientific analysis are essential.³⁶ An EIS must “describe the environment of the area(s) to be affected” and “insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken.”³⁷

The analysis of scenery in the DEIS is inadequate. As previously noted, a primary purpose of NEPA is to “assure for all Americans ... esthetically and culturally pleasing surroundings” and agencies must incorporate “the environmental design arts in planning and in decisionmaking.”³⁸ Also, the Forest Plan requires the agency to “[p]erform landscape/viewshed analysis, using as much of the available tools and technology as possible, when planning projects within viewsheds seen from Visual Priority Travel Routes and Use Areas.”³⁹ The Forest Service recognizes that it is a challenge to quantify the scenery resource – which heightens the need to show the impacts of the different scenic integrity objectives.⁴⁰

The DEIS should show what the amendment would do by lowering all project area scenic integrity objectives down to the “very low” scenic integrity objective – an impact that will remain until the harvested areas blend into the surrounding landscape, which can take years.”⁴¹ The DEIS makes an

³⁰ 36 C.F.R. 219.3(b).

³¹ DEIS at 6-7.

³² *Id.* at 6.

³³ 36 C.F.R. 219.8 (b)(2).

³⁴ 219.10(a)(1); 219.10(b)(1)(i).

³⁵ 40 C.F.R. § 1508.1(c).

³⁶ 40 C.F.R. § 1508.1(b).

³⁷ 40 C.F.R. § 1502.15; 1500.1(b); *N. Plains Res. Council v. Surface Transp. Bd.*, 668 F.3d 1067, 1084 (9th Cir. 2011); *Oregon Natural Desert Ass’n v. Jewell*, (9th Cir. 2016)

³⁸ 42 U.S.C. § 4331(b)(2); § 4332(a).

³⁹ Forest Plan at 4-54.

⁴⁰ USDA Forest Service. 2015. Saddle Lakes Timber Sale Final Environmental Impact Statement.R10-MB-740a at 180. Ketchikan-Misty Fiords Ranger District, Tongass National Forest, Ketchikan, Alaska. September 2015.

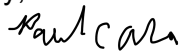
⁴¹ DEIS at 107.

effort to identify impacts to scenic qualities in the Saddle Lakes recreation area, but fails to display or disclose impacts to affected marine waterways.⁴² The Forest Service needs to redo the DEIS so as to complete a full and site-specific scenery analysis that discloses to the public the full visual impact of clearcuts in Visual Priority Routes. Also, the economic and social values of scenic landscapes are emerging national and global issues analyzed in scientific and academic literature from both the forestry and recreation disciplines. A revised DEIS should include a review of the literature and assess the extent to which degradation of scenic landscapes can cause long-term economic harm.⁴³

Conclusion

For the above reasons, we request that you cease planning on this project. If you do proceed, we request that you abandon any attempt at reducing scenic integrity objectives with a Forest Plan amendment and prepare a revised DEIS with downscaled action alternatives and a NEPA-compliant analysis of scenic impacts.

Sincerely,



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⁴² See, e.g. DEIS Table 40 & Fig. 2

⁴³ See, e.g. Ahtikoski, A. et al. 2011. Potential trade-offs between nature-based tourism and forestry, a case study in norther Finland. In: *Forests* 2011(2), pp. 894-912; Bayliss, J. et al. 2013. The current and future value of nature-based tourism in the Eastern Arc Mountains of Tanzania. CSERGE Working Paper, No. 2013-10, University of East Anglia, The Center for Social and Economic Research on the Global Environment (CSERGE). Available at: <https://www.econstor.eu/bitstream/10419/121958/1/768521041.pdf>; Bliss, J.C. 2000. Public perceptions of clearcutting. *Journal of Forestry*, Volume 98, Issue 12, December 2000, Pages 4–9, available at: <https://academic.oup.com/jof/article/98/12/4/4614167>; Hilsendager, K. 2014. Tourists' visual perceptions of forest management in Vancouver Island and Tasmania. Available at: <https://www.hd-research.ca/wp-content/uploads/Kyle-Hilsendager-PhD-Thesis-Final.pdf>; Ribe, R. 2003. Aesthetic perceptions of new forestry and the retention of green trees and down wood in timber harvests. Final report for USDA Pacific Northwest Research Station Cooperative Research Agreement 98-8032: Public perceptions of woody debris and green tree retention. Dept. of Landscape Architecture and Institute for a Sustainable Environment, University of Oregon, Eugene, OR. Available at: https://www.researchgate.net/publication/341775796_Aesthetic_perceptions_of_New_Forestry_and_the_retention_of_green_trees_and_down_wood_in_timber_harvests; Shrestha, R.K. et al., 2006. Valuing nature-based recreation in public natural areas of the Apalachicola River region, Florida. *Journal of Environmental Management* (2007). Available at: https://www.uwsp.edu/cnrap/UWEXLAKES/Documents/people/economics/39_natureBasedRecreation_shrestha_paper.pdf; Tyrvaenen, L. et al. 2008. Evaluating the economic and social benefits of forest recreation and nature tourism. Ch. 2 in: *European Forests*. Available at: https://www.researchgate.net/publication/249313264_Evaluating_the_benefits_and_impacts_of_forest_recreation_and_nature_tourism; Tyrvaenen, L, H Silvennoinen & Ville Hallikainen. 2016. Effect of the season and forest management on the visual quality of the nature-based tourism environment: a case from Finnish Lapland. In: *Scandinavian Journal of Forest Research* 2017. Vol 32, No. 4, 349-359