



Via Electronic Submission

October 19, 2020

Ketchikan Misty Fjords Ranger District
ATTN: South Revilla Integrated Resource Project
3031 Tongass Avenue
Ketchikan, AK 99901

RE: Public Comment re: South Revilla Integrated Resource Project Draft EIS

To Whom It May Concern,

This letter provides public comment from the Alaska Forest Association (AFA) to the United States Forest Service (USFS), Region 10, Ketchikan Misty Fjords Ranger District, regarding the Draft Environmental Impact Statement (EIS) for the South Revilla Integrated Resource Project (South Revilla) in the Tongass National Forest (Tongass).

USDA Secretary Vilsack's July 2013 Memorandum 1044-009 "Addressing Sustainable Forestry in Southeast Alaska," directed the USFS to maintain the existing industry during the transition to Young Growth (YG). The memorandum included 2 parts – the transition to YG and the maintenance of the timber industry while doing so. The 2016 Forest Plan (Plan) solidified these directives of YG transition and industry maintenance.

AFA's member operators in the Tongass are faced with challenging cost environments, a lack of predictable supply, and recurrent instances where the USFS has overstated volume resulting in fall downs as much as 70-80%. Continued publication of deficit sales points to the need for revisions to the 2016 Plan. These economic realities will specifically hinder the industry's ability to respond on the current iteration of the South Revilla sale.

The proposed project specific change to the Plan is ineffectual. The proposed change is only for the life of the current project. Returning to the old SIOs for the project afterwards would mean that areas harvested under the changed SIOs would not be available in the future without some modification. Additionally, the change has no value regarding the volume generated and does not help reduce costs. The increased volume is less than 3 MMBF over the entire project and the cost with the reduced SIO is greater.

If a project specific change is desired, the change should be for the life of the Plan and could be either one or both of the following: removal of the Visual Priority Routes (VPRs) within the project area and/or adjustments of the areas included in each Land Use Designation (LUD). All harvested areas should be included in the Timber Production LUD.

YG harvest should only be even aged; no 2 age or uneven age prescriptions. There are not sufficient acres of older YG to maintain the existing industry during transition or after if older areas are harvested with only 30-50% removal and the remaining acres are unavailable for 30-50 years.

Silvicultural prescription for Old Growth (OG) should be either even age or 2 age. All ground based (cable and shovel) should be even age. Helicopter acres should be 2 age. By making helicopter 2 age versus uneven age, the silvicultural prescription written for each unit could better reflect the amount of volume available that can be harvested economically. Silvicultural prescriptions should consider species composition of the stand being harvested and allow for different percentage of harvest by species versus the same amount of each species.

The USFS should not expend funds to reconstruct Log Transfer Facilities (LTFs) that do not have adjacent sort yards of sufficient size to allow for the scaling, sorting and storage of 4-5 MMBF of volume. The Shelter Cove LTF does not have an adjacent sort yard.

Although not necessary to produce an alternative that excludes the volume of proposed harvest on lands that will be transferred to the Mental Health Trust; it would educational to see the volume by each action alternative that would be lost if the exchange is finalized. This would provide greater clarity regarding what the USFS is offering.

Finally, efforts must be made to improve the economics of the proposed project. An analysis of the unit pool shows a significant deficit, which was also verified in the Draft. This project has been offered in various configurations over the years and has routinely not drawn any bidders. To ensure bidder response on the South Revilla project, provisions must be made to adjust areas and inter-adjacent areas. The viewshed modification is a step towards improved economics for the project, though is not in and of itself enough to bring the Draft out of deficit.

Thank you for the opportunity to comment on the South Revilla Integrated Resource Project Draft EIS. Please contact me at (907) 225-6114 or afa@calforests.org with any questions.

Sincerely,



Tessa Axelson
Executive Director