October 19, 2020

Shane Walker, District Ranger
ATTN: South Revilla Integrated Resource Project
USDA Forest Service
Tongass National Forest, Ketchikan Misty Fjords Ranger District
3031 Tongass Avenue
Ketchikan, AK 99901

Via: https://cara.ecosystem-management.org/Public/CommentInput?Project=53477
SM.FS.AtkmComments@usda.gov

RE: Comments on the Draft Environmental Impact Statement for the South Revilla Integrated Resource Project

Dear Mr. Walker,

Please accept these comments submitted on behalf of Trout Unlimited (TU) to the Draft Environmental Impact Statement (DEIS) for the South Revilla Integrated Resource 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 more than 20,000 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, 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.

TU has a long history of working collaboratively with the Forest Service and other stakeholders on the Tongass. This partnership 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 encourage the Forest Service to advance its transition toward 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 supporting sustainable forest management will enable the Forest Service to increase its support for Southeast Alaska's rural communities and be more responsive to the needs of the region. By ending the practice of 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 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.

The Tongass is the nation's top salmon-producing forest. 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.[1] In addition to this, more than 1.3 million out-of-state visitors flock to the Tongass each year, contributing another $1 billion annually in economic activity and approximately 18% of jobs to the region.[2] 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.[3]

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.[4] Per capita income for Southeast Alaskans outpaces statewide and national averages while unemployment rates remain lower than statewide or national averages.[5] Southeast Alaska's economy 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 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.[6] It is past time for the Forest Service to catch up with the rest of the region and the nation, and shift its Tongass timber program to one that plans and implements appropriately-scaled timber sales that support the region's small mills and encourage local manufacturing of young-growth forest products.

Recent old-growth timber sales and the USDA's proposal to repeal the Roadless Rule on the Tongass have undercut the Tongass transition, eroded public confidence and trust in the Forest Service, and serve as unnecessary obstacles to the creation of a sustainable forest products industry in the region. Rather than encouraging investment in transition technologies and entrepreneurship within the Tongass timber industry, these actions encourage 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 or other politically-driven decisions will provide new, highly-subsidized old-growth timber volume.

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[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] Rain Coast Data, *Southeast Alaska by the Numbers 2020*, prepared for Southeast Conference at 6 (Sep 2020). *available at http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20Numbers%202020.pdf*.

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

[4] USDA, *Tongass Land and Resource Management Plan Final Environmental Impact Statement Plan Amendment*, R10-MB-769e at 3-478 (June 2016) *hereinafter* FEIS.

[5] FEIS at 3-478 to 479.

[6] *See* Rain Coast Data, at 5.

Timber planning too often comes at the expense of the region's strong economic base of fisheries and tourism. Once-productive salmon streams no longer support abundant salmon runs or 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.[7] More than 30% of all instances on the Tongass where forest roads cross fish streams—1,120 instances in total—fail to meet state or federal standards and impede fish access to nearly 250 miles of stream habitat.[8] Roughly one-in-four jobs in Southeast Alaska are in either the fishing or tourism industries.[9] If the Forest Service is to truly support the local and regional economy, it must manage the Tongass and the Tongass timber program with the fishing and tourism industries at the forefront and to, in every way possible, avoid and minimize impacts to fish and wildlife habitat.

In addition to the broad concerns discussed above, TU has the following additional comments on the South Revilla Integrated Resource Project DEIS:

- The DEIS shows several units where Class IV streams flow directly into a Class I streams or a stream listed in the Anadromous Waters Catalog (AWC), including units, 43, 44, 47, 65, 95, 96, 104, 504, 521, 558, 586, 587. The Forest Service should ground truth these units to confirm the data are accurate. For any instance where a Class IV stream flows into either a Class I stream or a stream listed in the AWC, the Forest Service should require a minimum 100' stream buffer along at least the lower 1000' of the Class IV stream to ensure logging activities do not cause erosion or sedimentation into fish habitat.

- The DEIS shows several units where Class IV streams flow directly into Class II streams, including units 1, 2, 11, 12, 14, 15, 18, 19, 22, 23, 25, 29, 34, 47, 48, 58, 65, 66, 79, 88, 102, 103, 511, 512, 515, 516, 517, 520, 536, 537, 544, 547, 560, 561, 577, 578, 579, 582, 583, 584, 585, 586, 702. The Forest Service should ground truth these units to confirm the data are accurate. For any instance where a Class IV stream flows directly into a Class II stream, the Forest Service should require a minimum 100' stream buffer along at least the lower 1000' of the Class IV stream to ensure logging activities do not cause erosion or sedimentation into fish habitat.

- The DEIS includes several units on the East side of Carroll Inlet that have discrepancies between the "TNF Stream Lines" layer and the Alaska Hydrography Database ("AK_Hydro") AK Hydro Data Snapshot (updated March 31, 2020). The AK Hydro Snapshot layer shows several Class III

[7] USDA, *Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013*, R10-MB-734 at 11 (Nov. 2011).
[8] Paul Robbins, USDA, *Tongass National Forest Fish Passage at Road-Stream Crossings Status* 1 (Mar., 2020).
[9] *See* TCW Economics, at 16; Rain Coast Data, at 5.

or IV streams flowing directly to Class I or II streams. These attributes are not present in the TNF Stream Lines layer (Units 568, 578, 579, 580, 704). There are also 2 units containing Class II streams depicted in the AK_Hydro layer (Units 568, 704), but not drawn in the planning layer. While the DEIS includes language about Incomplete and Unavailable information, this information is widely available and should be incorporated in the EIS.

- In the discussion of stream flow impacts to the 12 project area watersheds with cumulative harvest levels above detectable levels in the action alternatives, there are discrepancies in anadromous and resident fish habitat miles when compared to GIS data (TNF Stream Lines layer, class I and II streams). While DEIS data and GIS data are in close agreement for 2 of these watersheds (19010102050304 and 19010102050602), the rest have understated fish habitat mileage to varying degrees. The most egregious being 19010102050402 (DEIS: 0 miles anadromous, 3.77 miles resident; GIS: 2.06 miles anadromous, 4.96 miles resident). These discrepancies should be resolved because they lead to flawed assumptions and inaccurate conclusions about the risk of increased flows and their potential effects on fish habitat.

- The DEIS concludes that "direct and indirect effects of harvest activities are similar between action alternatives." However, this conclusion is unsupported by the data and analysis. The proposed action will have the most negative impacts on fish habitat and fish resources in the project area. The Forest Service should seek to reduce the amount of negative effects by reducing the project footprint, reducing the amount of new roads and stream crossings, and reducing the percentage of harvest in watersheds—especially near Class I or II streams or in units with previous logging or road building activities.

- Restoration and fish habitat improvements should be planned and included in greater abundance throughout the action alternatives. All aquatic organism passage issues (red pipes) should be fixed before any new road construction or reconstruction is allowed.

When evaluating the benefits from forest lands to society, the Forest Service places far too much emphasis on traditional extractive resources while largely ignoring benefits from fish, wildlife 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 country, but is especially relevant in Southeast Alaska where the Tongass comprises such a large portion 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 Forest Service to manage the Tongass in a way that prioritizes its contributions in fish, wildlife and visitor services.

Rather than planning yet another costly old-growth timber sale that is unsustainable and detrimental to the long-term resiliency of southeast Alaska, the Forest Service should design and implement a project that sustainably manages timber lands, encourages new investment in transition technologies, and that 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 or by phone at 907.227.1590 if you have any questions.

Sincerely,

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