



September 3, 2021

Carey Case
PO Box 1328
Petersburg, AK 99833

Via: <https://cara.ecosystem-management.org/Public/CommentInput?Project=60639>
<https://cara.ecosystem-management.org/Public/CommentInput?Project=60641>

RE: Comments on Upper Falls Creek and Thomas Bay Young-Growth Timber Sales.

Dear Ms. Case,

Please accept these comments submitted on behalf of Trout Unlimited (TU) on the Upper Falls Creek and Thomas Bay young-growth timber sales. Trout Unlimited is the nation's largest sporting organization dedicated to coldwater conservation with more than 400 chapters and more than 300,000 supporters nation-wide. Trout Unlimited 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. Many of TU's members live and work in the Tongass, and rely on its important fish, wildlife and water resources for fishing, hunting, recreation, and for employment in related industries.

Trout Unlimited has a long history of working collaboratively with the Forest Service and other stakeholders on the Tongass. We have partnered with the Forest Service to successfully complete numerous watershed restoration projects, improve riparian habitat, replace failing culverts, and to help tell the story of these successes to local residents, visitors, and the broader public. Trout Unlimited has committed significant financial and staff resource to protecting and restoring important fish, wildlife and water resources on the Tongass, and to ensuring the region's unique wild salmon resources, abundant wildlife and beautiful scenery continue to serve as the economic, cultural and spiritual foundation of southeast Alaska.

We commend the Forest Service for ending unsustainable and damaging large-scale old-growth logging on the Tongass, and were especially heartened by the U.S. Department of Agriculture's (USDA) recently-announced Southeast Alaska Sustainability Strategy. Focusing the Forest Service's management resources on restoration, recreation, and resiliency is essential to meeting the needs of local communities, ensuring a diverse and sustainable economic future for the region, and to mitigating the mounting threats of the climate crisis.

With this in mind, TU encourages the Forest Service to rethink its approach to the Upper Falls Creek and Thomas Bay young-growth timber sales. Both of these projects have an identical purpose and need, which is "managing the timber resource for the production of sawtimber . . . and providing a reliable and predictable flow of commercial timber." Yet, this narrow purpose and need, and in turn the initial design of both projects, suggests the Forest Service is forgetting the hard lessons and stark realities that underpin the Southeast Alaska Sustainability Strategy, which the USDA announced not even two months ago.

Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization

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As we have seen with past young-growth timber sales on the Tongass, such as the Kosciusko and Vallenar timber sales, operation costs are exorbitant and the only way to make these timber sales economically viable is through massive government subsidy. These sales produce very few Alaska jobs since foreign workers are used to do the logging and the timber is exported in the round to foreign markets without any local milling or processing. Because these young-growth sales rely on clear-cut logging, the project area becomes even more degraded, less productive for fish and wildlife, and less valuable for recreation or subsistence users. Lastly, clear-cut logging mature second growth stands, as these sales do, makes us more vulnerable to the impacts of climate change, less resilient, and reduces the forest's ability to sequester and store carbon.

To be clear, TU does not oppose logging on the Tongass. Rather, TU encourages the Forest Service to reimagine how it does business on the Tongass and to revamp the Upper Falls Creek and Thomas Bay timber sales into projects that address the full suite of resources on the land. The USDA's Southeast Alaska Sustainability Strategy made clear the Forest Service would focus its management resources on restoration, recreation and resiliency. As currently proposed, these two timber sales undermine the USDA's strategy and accomplish none of its objectives. Instead of planning narrowly-tailored timber sales that focus solely on extracting sawtimber through industrial-scale clear-cut logging, the Forest Service should invest in its lands. The Forest Service should redesign the Upper Falls Creek and Thomas Bay projects to be investments in restoring the landscape, improving fish and wildlife habitat, promoting recreation and cultural values, and increasing resiliency and the project area's capacity for carbon storage. Removing forest products can be part of a suite of objectives met by these projects, but should occur only where consistent with the aforementioned objectives. Instead of clear-cut logging, prescriptions should be developed to promote old-growth characteristics and wildlife habitat. Streams and riparian areas should be restored. Roads should be maintained to reduce erosion and allow fish passage, or where appropriate decommissioned all together.

There has never been a better time for the Forest Service to invest in second-growth lands on the Tongass, to restore its lands, and to help create resilient landscapes and communities. We hope the Forest Service will take this opportunity to reinvent the Upper Falls Creek and Thomas Bay timber sales, and if it does TU would be eager to partner with the Forest Service to help make them a success.

Thank you for your consideration. Please do not hesitate to reach me at 907.227.1590 or austin.williams@tu.org if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Austin Williams', with a stylized, flowing script.

Austin Williams

Alaska Director of Law and Policy