

ALASKA RAINFOREST DEFENDERS

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September 17, 2021

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Attn: Thomas Bay Young-Growth Timber Sale Project
Petersburg Ranger District
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Petersburg, Alaska 99833
Submitted electronically at:
<https://cara.ecosystem-management.org/Public//CommentInput?Project=60639>

Ms. Case:

I submit these comments on behalf of Alaska Rainforest Defenders (“Defenders”) regarding the Thomas Bay Young-Growth Timber Sale Project. The proposed action is to remove 22 million board feet (MMBF) of timber from 14 cutting units comprising a total of 835 acres. The project would also construct 6 miles of new logging roads and reconstruct another 6.5 miles of decommissioned logging roads.

Our main request is that you cease planning on this large timber project or at a minimum develop several downscaled alternatives with substantially reduced timber volumes.

Our members use the project area and surrounding environment for recreation, scenic values, commercial fisheries, subsistence, hunting, wildlife viewing, scientific research and other activities. The proposed action would adversely impact these other multiple use values.

We first request that you allow for an additional public comment period prior to preparing the draft Decision Notice (DN). The scoping letter indicates plans to limit opportunities for public comment by combining the scoping and 30-day comment periods with no additional comment period before releasing the draft decision. The District Ranger’s Project Initiation Letter, however, directed staff to “involve the public in the NEPA process, such as scoping *and other public involvement opportunities*” in order to identify issues and inform the development of alternatives.¹ The letter stated that “I expect ... the encouragement of early, meaningful participation by the general public”² Importantly, the timing of this single proposed comment period restricts public participation because most Southeast Alaska residents are in the midst of their peak working season which occurs during the late summer months. Also, in addition to its broad requirement to provide for public input, NEPA requires the agency to make a FONSI available for public comment prior to a final decision when the proposed action is similar to one which normally requires an EIS.³

¹ Thomas Bay Young-Growth Timber Sale Planning Record (PR) Document #880-0001 (Sandhofer, T. Project Initiation Letter Thomas Bay YG Timber Sale).

² *Id.*

³ 40 C.F.R. §1501.4(e)(2)(i)

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I. Introduction

Our major concerns about this project pertain to adverse impacts to wildlife and fish and further loss of socio-economic benefits resulting from the proposal to implement short-rotation clearcut harvests for recovering second-growth forests. This clearcutting will prevent those recovering forests from achieving old-growth characteristics, and reduce long-term habitat values for wildlife by prolonging the stem exclusion phase of forest succession. Deer winter habitat and project area watersheds have already been seriously impacted by past industrial scale logging. Any additional impacts to remaining habitat, even if it is of lesser quality, will worsen an already bad situation for deer, wolves and subsistence hunters, harm forest dependent species such as goshawks, and pose unjustifiable risks to project area watersheds and fishery values. We request the agency provide detailed analysis regarding the following broad categories:

- *Evaluate and disclose* significant adverse environmental impacts to wildlife associated with the second-growth logging plan for the project area including long-term impacts caused by delaying forest succession;
- *Identify* the project area as providing unique habitat conditions and exceptional multiple use values on the Southeast Alaska mainland in light of the number of wildlife species utilizing Thomas Bay and its high value for local hunting and subsistence and visitor adventure tourism opportunities, and its proximity to communities (Petersburg and Kupreanof);
- *Take a hard look at* impacts to aquatic habitat and fish populations given

the cumulative risks of climate change and short-rotation timber management, which prevents watershed recovery;

- *Disclose* public health and safety risks associated with the increased introduction of invasive species in the project area and Petersburg Ranger District’s plans to treat such outbreaks with Glyphosate, a known carcinogen;
- *Consider* the extent to which this project may establish a precedent for short-rotation management of federally-owned recovering forestlands that favors non-local timber exporters over small local mills and recreation providers.

II. The Forest Service should re-scope this project and prepare an EIS

We request that you restart the scoping process and publish a Notice of Intent to prepare *a full EIS* prior to any further planning on the project.

A. The Proposed Action is a large timber sale necessitating analysis in an EIS

NEPA requires federal agencies to analyze the foreseeable environmental impacts, including direct, indirect, and cumulative impacts, of “major Federal actions.”⁴ If the action *may* cause degradation of some human environmental factor, the agency must prepare an EIS.⁵ In other words, the threshold issue for determining whether or not to prepare an EIS is not whether significant effects will in fact occur. Instead, the trigger is if there are substantial questions about whether a project will have a significant effect on the environment.⁶

The Forest Service needs to recognize how the project’s timber volume, scale and prescriptions are intertwined with significant environmental impacts – or even substantial questions about those impacts. The proposed action is a large timber sale that the agency intends to clearcut, which triggers questions about significant environmental effects. In the 2019 Central Tongass Project DEIS the Forest Service described the proposed commercial clearcutting of Petersburg Ranger District second-growth forests, including Thomas Bay, as a “*large-scale habitat alteration*.”⁷ It seems impossible that a “large-scale habitat alteration” could occur without causing adverse environmental impacts.

The Tongass National Forest’s own past environmental analyses indicate the need to produce an EIS. The agency has consistently prepared an EIS for timber sales that entail industrial scale clearcutting of large amounts of timber. Between

⁴ 42 U.S.C. § 4332(2)(C).

⁵ *Idaho Sporting Congress v. Thomas*, 137 F.3d 1146, 1149 (9th Cir. 1998).

Foundation for N. Am. Wild Sheep v. United States Dep’t of Agric., 681 F.2d 1172, 1178-79 (9th Cir. 1982)(emphasis added); *see also Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir. 1998)(the “substantial question standard does not require a showing ‘that significant effects will in fact occur’”).

⁶ *Idaho Sporting Congress v. Thomas*, 137 F.3d 1146, 1150 (9th Cir. 1998).

⁷ USDA Forest Service. 2019. Central Tongass Project Draft Environmental Impact Statement at 3-115. R10-MB-832a. Tongass National Forest, Petersburg Ranger District and Wrangell Ranger District. July 2019 (emphasis added)(hereinafter Central Tongass Project DEIS).

1998 and 2006, the agency produced 10 timber project EAs for timber volumes that ranged between 2.6 and 8.7 MMBF, or an average volume of approximately 5.5 MMBF.⁸ Conversely, between 1998 and 2011 the agency has after producing an EIS, issued decisions on 19 timber sales. Many of these projects removed similar or even considerably smaller amounts of forest (in some cases less than half) compared to the proposed action.⁹

The only similar Tongass National Forest project analyzed in an EA was the Kosciusko Vegetation Management EA - a 29.9 MMBF timber sale. We filed a formal objection to that project based primarily on the need to prepare a full EIS because the project was a large timber project that authorized the extraction of 29.9 MMBF of timber from recovering forests through 396 acres of clearcuts (even-aged management), 856 acres of clearcuts with reserve patches (two-aged management) and 209 acres of partial clearcuts (uneven-aged management).¹⁰

Both the Kosciusko project EA and the present proposal to analyze this project in an EA are inconsistent with the widespread recognition that the very nature of large-scale clearcutting results in significant, adverse environmental effects. In *Wyoming Outdoor Coordinating Council v. Butz*, the Forest Service refused to prepare an EIS analyzing a 15 MMBF sale - with fewer clearcuts than the proposed action here - 670 acres.¹¹ The court concluded that the agency needed to prepare an EIS, recognizing that “[t]he clearcutting of the timber planned obviously will have a significant effect on the environment for many years.”¹²

In 1995, a federal district court in Vermont considered a Forest Service project that would remove 3.2 million board feet of timber through 300 acres of clearcuts and increase road access to wildlife habitat.¹³ The court determined that “[o]n its face, the proposed action, which includes clearcutting of over 300 acres and its admitted attendant effects such as intrusion into bear and neotropical bird habitats, is ‘significant’ under any reasonable construction of the term.”¹⁴

Similarly, in 1997, a Pennsylvania federal district court required the Forest Service to prepare an EIS for a 31 MMBF timber sale.¹⁵ The court identified a

⁸ These projects were the 1998 Nemo, Todahl and Twin Creek projects, the 2000 Doughnut and Polk projects, the 2004 Boundary and Shady projects, and the 2006 Goose Creek, Overlook and Soda Nick projects.

⁹ These projects include: [1-2] the 1998 Crane and Rowan Mountain and Crystal Creek Projects (24 and 13 MMBF); [3] the 1999 Canal Hoya Project (13 MMBF); [4-6] the 2000 Kuakan, Luck Lake and Skipping Cow Projects (12, 12.9 and 19 MMBF); [7] the 2001 – 2003 Woodpecker Project (16.3 MMBF); [8-11] the 2003 Finger Mountain, Licking Creek and Madan Projects (21.4, 17 and 27 MMBF); [12] the 2004 Three Mile Project (19.5 MMBF); [13-14] the 2005 Couverden and Emerald Bay Projects (23 and 16.4 MMBF); [15-16] the 2006 Scott Peak and Tuxekan Projects (8.3 and 18.3 MMBF); [17-18] the 2007 Scratchings and Traitors Cove Projects (21 and 17.1 MMBF); [19] the 2008 Baht Project (4.3 MMBF) and [20] the 2011 Central Kupreanof Project (26.3 MMBF).

¹⁰ See <https://www.fs.usda.gov/project/?project=45037>

¹¹ *Wyoming Outdoor Coordinating Council v. Butz*, 484 F.2d at 1247, 1251, n. 5 (10th Cir. 1973).

¹² *Id.* at 1250-1251 (emphasis added).

¹³ *National Audubon Society v. Hoffman*, 917 F.Supp. 280, 287-288 (D. Vt. 1995)(adding that “[t]he magnitude of the instant proposals to extend road and conduct logging operations, as set forth in an EA totaling over 65 pages, undermines defendants’ contention that the proposals are not significant”).

¹⁴ *National Audubon Society v. Huffman*, 917 F.Supp. 280, 288 (D. Vt. 1995).

¹⁵ *Curry v. Forest Service*, 988 F.Supp. 541, 545, 556 (W.D. Penn. 1997).

number of relevant factors that are applicable to the Thomas Bay Project: (1) a large number of acres; (2) the predominant use of clearcutting; (3) the presence of sensitive species; (4) the proximity of the project to old-growth forest and to important watersheds; and (5) the length of the EA (49 pages, with 349 pages of appendices).¹⁶

9th Circuit courts have also recently required the timber agencies to prepare an EIS for large timber projects. An Oregon court required the Forest Service to prepare an EIS for the Crystal Clear Restoration Project, a large project that primarily involved experimental variable density thinning.¹⁷ An Oregon federal district court also required an EIS for the Forest Service's Goose Project which sought to improve stand conditions, reduce hazardous fuels and provide timber.¹⁸ The project included 8 miles of temporary road and affected more acreage than the Thomas Bay action alternative, but through commercial and non-commercial thinning (1,255 acres and 800 acres, respectively) rather than clearcutting.¹⁹ One issue these cases share with the Thomas Bay project involved controversy over clearcutting maturing forests.

B. NEPA's intensity factors

The determination of a significant effect on the environment requires consideration of "context and intensity."²⁰ The context is the scope of the agency's action, including affected interests.²¹ Intensity is the degree to which the agency action affects the locale and interests identified in the context part of the inquiry.²² Intensity requires evaluation of various factors, including "[t]he degree to which the proposed action affects public health or safety[.]" ... "[u]nique characteristics of the geographic area, such as ... ecologically critical areas[.]" ... "[t]he degree to which the effects on the quality of the human environment are likely to be highly controversial[.]" ... "[t]he degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks[.]" ... "[t]he degree to which the action may establish a precedent for future actions with significant effects[.]" ... "[w]hether the action is related to other actions with individually insignificant but cumulatively significant impacts[.]" and [t]he degree to which the action may adversely affect ... significant cultural resources."²³

"[O]ne of [the NEPA intensity] factors may be sufficient to require preparation of an EIS in appropriate circumstances."²⁴ In some timber sale cases, none of the significance factors by themselves required an EIS, but collective controversies,

¹⁶ *Id.* at 551-552 (noting that the CEQ explains that "[i]n most cases, a lengthy EA indicates that an EIS is needed").

¹⁷ *Bark et al. v. U.S. Forest Service*, 958 F.3d 865, 868 (9th Cir. 2020); *see also Oregon Wild v. Bureau of Land Management*, Case No. 6:14-CV-0110AA (D. Or. 2015) (requiring the Forest Service to prepare an EIS for the 6.4 MMBF White Castle Project in large part because the agency proposed to clearcut 180 acres of "mature forest" – stands over 80 years old, which had wildlife habitat values).

¹⁸ *Cascadia Wildlands v. U.S. Forest Service*, 937 F.Supp.2d 1271, 1274, 1284 (D. Or. 2013).

¹⁹ *Id.* at 1274.

²⁰ 40 C.F.R. § 1508.27.

²¹ *National Parks & Conservation Ass'n v. Babbitt*, 241 F.3d 222, 731 (9th Cir. 2001).

²² *Id.*

²³ 40 C.F.R. § 1508.27(b).

²⁴ *Ocean Advocates v. U.S. Army Corps of Eng'rs*, 402 F.3d 846, 865 (9th Cir. 2005).

uncertainties and effects on areas with unique ecological characteristics warranted analysis in an EIS.²⁵

1. The project entails unique or unknown risks to wildlife

This project may have significant adverse impacts to project area wildlife that vary by species. The NEPA analysis must consider “[t]he degree to which the possible effects on the human environment are highly uncertain or involve unique and unknown risks.”²⁶ We request that the NEPA analysis provide particular attention to risks to project area wildlife populations. Prior planning on this project as part of the larger, cancelled Central Tongass Project indicated that the agency had identified “wildlife concerns.”²⁷ Further, the District Ranger’s Project Initiation Letter for this project identified preliminary concerns about the effects of timber harvest and road construction on wildlife, including habitat, travel corridors and subsistence.²⁸

Over 16,000 acres of the limited amount of forested habitat in Game Management Unit 1B have been logged to date.²⁹ Clearcut logging is having adverse impacts on project area wildlife which will recur and potentially worsen over time because of this project. The moose population is now declining due to reductions in carrying capacity caused by post-logging habitat changes.³⁰ The same changes “have and will continue to further reduce deer carrying capacity” in the area.³¹ Black bears benefit temporarily from short-term forage increases but timber harvest is “the most serious threat” to their habitat in the project area over the long-term.³²

The NEPA analysis must analyze the risks associated with logging recovering forests prior to the re-initiation of old-growth forest characteristics. Sacrificing 835 acres of substantially regenerated second growth is a significant cumulative impact because the project area has already been heavily impacted by past logging. This is a particular concern for mainland areas where snow interception capacity is much more critical to the viability of project area wildlife. As previous Forest Service

²⁵ *Cascadia Wildlands v. U.S Forest Service*, 937 F.Supp.2d 1271, 1274 (D. Or. 2013).

²⁶ 40 C.F.R. §1508.27(b)(5)

²⁷ Central Tongass Project Draft Environmental Impact Statement at 3-62, Table 11.

²⁸ Thomas Bay Young-Growth Timber Sale Planning Record (PR) Document #880-0001 (Sandhofer, T. Project Initiation Letter Thomas Bay YG Timber Sale).

²⁹ Lowell, R.E. 2014. Unit 1B black bear management report. Chapter 2, Pages 2-1 through 2-14 in P. Harper and L.A. McCarthy, editors. Black bear management report of survey and inventory activities. 1 July 2010-30 June 2013. Alaska Department of Fish and Game. Juneau, Alaska. Hereinafter Lowell, R.E. 2014. Unit 1B black bear management report.

³⁰ Lowell, R.E. 2018. Moose management report and plan, Game Management Unit 1B: Report period 1 July 2010-30 June 2015, and plan period 1 July 2015-30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-3, Juneau. Hereinafter Lowell, R.E. 2018. Moose management report and plan, Game Management Unit 1B.

³¹ Lowell, R.E. 2015. Unit 1B deer. Chapter 2 pages 2-1 through 2-9 [In] P. Harper, editor. Deer management report of survey and inventory activities 1 July 2012-30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-3, Juneau. Hereinafter Lowell, R.E. 2015. Unit 1B deer.

³² Lowell, R.E. 2014. Unit 1B black bear management report.

analyses recognized, clearcutting could increase short-term deer forage, but that forage “may not be available to deer during winter if covered by snow.”³³ Further:

In the long-term, commercial harvest of young growth would preclude these stands progressing toward old-growth habitat conditions that would again provide snow interception and forage within the stand. The forage created by clearcutting young-growth would only last for the short-term until the stand again reaches stem exclusion stage (around 25 years).³⁴

Alaska Department of Fish and Game wildlife managers also believe clearcutting will have adverse long-term effects on project area wildlife populations. Clearcuts create a temporary forage enhancement that last for just the first 25 years of a 100 to 150 year timber harvest rotation.³⁵ After 25 years, the recovering forest shades out and eliminates forage species.³⁶ Local wildlife managers explain that “[t]he short-term advantages of clearcutting for moose may be offset by the longer period of reduced forage in the second-growth conifer forest and the loss of shelter habitat for moose during the time when the area is clearcut.”³⁷

The loss of older second-growth trees caused by this project in particular raises substantial questions about impacts to deer given mainland habitat conditions. Deer in the project area are highly susceptible to fluctuations caused by severe winter weather, and the deep-snow winter during 2006-2007 reduced already low populations in unit 1B.³⁸ Forest Service researchers have found that older stands “appear to provide some snow interception” and other features that may provide wildlife habitat values over the next few decades.³⁹ The importance of snow interception is much higher in “areas closer to the mainland that have greater snowfall” and “[i]ncreased snow depths also intensify deer preference for older young-growth forests, likely due to facilitated movement from snow interception from the closed canopy despite low forage.”⁴⁰

One of the most significant adverse impacts to deer thus pertains to the need for varying habitat needs within seasons or even over periods of years, particularly for snow interception.⁴¹ The Forest Service’s myopic focus on forage in clearcuts arbitrarily fails to address key winter habitat needs:

³³ Central Tongass Project Draft Environmental Impact Statement at 3-85.

³⁴ *Id.*

³⁵ Lowell, R.E. 2018. Moose management report and plan, Game Management Unit 1B.

³⁶ *Id.*

³⁷ *Id.*

³⁸ Lowell, 2015. Unit 1B deer. Chapter 2 pages 2-1 through 2-9 [*in*] P. Harper, editor. Deer management report of survey and inventory activities 1 July 2012-30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-3, Juneau.

³⁹ Bennetson, B. 2020. Tongass National Forest young-growth management guidelines for stands with a wildlife management objective. Exh. 3 of the Tongass Young-Growth Management Strategy, USDA Forest Service, Tongass National Forest, Juneau, AK. 86 pp.

⁴⁰ *Id.*

⁴¹ Gilbert et al. (2017), at 247.

For ungulates at temperate and higher latitudes, winter is often the limiting season for survival, when cold temperatures and snowfall restrict the availability of forage and increase costs of movement. In addition, vulnerability of ungulates to predators can be higher in snow-covered landscapes because of reduced nutritional condition and increased cost of movements for prey relative to predators. Subsequently, habitat selection of ungulates in winter can be strongly shaped by the landscapes of energetic costs and risk of death. As snow depth increases, values of habitat to wildlife may be completely reversed from low-snow conditions. As habitat types with abundant forage but little canopy cover to intercept snow become unusable, habitats with adequate forage and good canopy cover become preferred.⁴²

There is little the Forest Service can do to address the need for forest cover to reduce snow accumulation other than allow juvenile trees to mature.⁴³ As Person and Brinkman, explain, even if climate change results in milder winters, precipitation and extreme storm probabilities may increase, increasing risks of deep snow events that can substantially reduce deer numbers to low levels for extended periods of time.⁴⁴ Because project area deer are susceptible to both predation from wolves and bears and severe winter die-offs, serious species-specific risks arise from the Forest Service's failure to plan for long-term winter range needs.

2. Intensive second growth logging entails unknown and uncertain risks to recovering watersheds

The NEPA analysis also needs to identify uncertainties and unknown risks regarding potential impacts on project area salmon populations. This project would adversely impact salmon production through road construction activities in fish habitat accompanied by intensive clearcutting of second growth recovering forests – and do so at a time when the region's salmon production capacity is highly variable due to multiple environmental factors.

The Forest Service's 1995 Anadromous Fish Habitat Assessment made numerous findings and recommendations related to reducing the impacts of second-growth logging on salmon habitat in southeast Alaska. The Assessment explained that:

The cumulative effects of frequent disturbances in the Pacific Northwest have been shown to substantially reduce the quality of freshwater fish habitats resulting in negative consequences for species, stocks, and populations of fish that depend on them, even if coniferous cover is left in buffer strips along the fish-bearing streams. Fish-bearing streams represent only a small portion of stream mileage in any watershed. Because recovery of fish habitat from the effects of extensive logging in a watershed may take a century or more, recovery may never be complete if forests are clearcut harvested and watersheds are disturbed extensively

⁴² *Id.* (emphasis added)(internal citations omitted).

⁴³ Hanley et al 1989, at 47.

⁴⁴ Person and Brinkman 2013.

on rotation cycles of about 100 years. Few refuges remain in a watershed that fish can use during such widespread, intense, and recurrent disturbances.

...Should freshwater habitats be degraded for long periods, salmon and steelhead stocks will eventually be confronted simultaneously with low marine productivity and degraded freshwater habitat. The likely result of such double jeopardy could be high, long-term risk of extinction.⁴⁵

3. The project is controversial because of intensive clearcutting

A project is highly controversial such that an EIS may be required if there is a “substantial dispute about the size, nature, or effect of the major Federal action rather than the existence of opposition to a use.”⁴⁶ This can occur when there is considerable evidence that a project will not meet its goal, or the effects are highly controversial and uncertain.⁴⁷

The Forest Service’s decision to propose large-scale clearcutting for export is controversial in the context of the project’s stated purpose of providing a supply for “forest products” and “local and regional mills.” Just two years ago, the Petersburg Ranger District stated that timber sale purchasers could export 100 percent of the second growth volume because there are no markets for domestically sawn young growth and no local mill designed to handle second-growth logs.⁴⁸ Moreover, the agency projected that raw log exports would provide the only available markets for at least a decade or more.⁴⁹ The decision to proceed with 835 acres of clearcuts for “local mills” establishes a “substantial dispute” about project effects, necessitating analysis in an EIS.

For example, a small logging company interested in selective cutting of second-growth expressed significant disappointment in the proposed action:

Unbelievable. Apparently, you still see the forest as a crop to be mowed down. ... What a joke: maybe you should be highlighting the “transition” away from clearcutting as a practice: this is not Forestry; it is habitat destruction and deforestation.⁵⁰

A second local business, Second Growth Homes LLC, interested in local development of second-growth echoed the same concerns in an e-mail to the agency – that the Forest Service would “make the same mistakes they made in past harvest” by clearcutting second growth stands with negative effects on the environment and communities.⁵¹ The operator wrote that: “This is appalling. This is not the way to

⁴⁵ U.S. Forest Service. 1995. Report to Congress: Anadromous fish habitat assessment. Pacific Northwest Research Station, Alaska Region. R10-MB-279.

⁴⁶ *Native Ecosystems Council*, 428 F.2d at 1240.

⁴⁷ *Bark et al. v. U.S. Forest Service*, 958 F.3d 870-71 (9th Cir. 2020).

⁴⁸ Central Tongass Project Draft Environmental Impact Statement at 3-66.

⁴⁹ *Id.*

⁵⁰ PR document # 880-0029 (August 20, 2021 e-mail from Tenakee Logging Company to Petersburg Ranger District silviculturist Ben Case).

⁵¹ PR Document 880_0032 (August 20, 2021 e-mail from Second Growth Homes LLC, to Petersburg Ranger District silviculturist Ben Case).

harvest this Timber. There is a need to leave timber stands for wildlife.”

Clearcutting is also controversial because of its effects on recreation and tourism. The Forest Service has already determined that second-growth logging would have adverse scenic impacts and projects “would need to be carefully sited and designed in order to maintain the existing scenic integrity of the area, and compliance with the [Scenic Integrity Objective] may be difficult to achieve.”⁵² The Forest Service should at a minimum cease planning on any clearcuts within the Scenic Viewshed LUD and further downscale the project because Thomas Bay is a primary destination for both local and guided recreation activities – with “some of the finest paddling and hiking in Southeast Alaska.”⁵³

Clearcutting will result in harm to local recreationists and the visitor products industry: displacement by timber operations, loss of scenic values, and harm to fish and wildlife.⁵⁴ Local and regional visitor products providers plan itineraries and make bookings years in advance and need access to multiple locations across the landscape in order to disperse and provide remote recreation opportunities. The primary activities sought by the guided public and independent recreationists are remote outdoor hiking and wildlife viewing opportunities. The proposed action would significantly reduce the quality of the visitor experience in several ways and likely result in unusable recreational habitat for years.

The NEPA analysis needs to provide data about guided use of the project area and analyze the site-specific needs of tour operators. Recent Forest Service environmental analyses for timber sales produced by timber sale planners have vastly underestimated the extent to which reduced scenic values and displacement by timber operations will adversely impact commercial recreation providers. For example, the Petersburg Ranger District recently projected that clearcutting in or adjacent to remote recreation hotspots such as Thomas Bay would be benign, with “temporary decreases” in use during timber extraction activities.⁵⁵

This belief is wrong and reflects a gross misunderstanding of the recreational values associated with standing forests. Timber sale activities will displace commercial recreation activities for decades because activities such as log transfer operations and upland timber extraction will destroy the currently remote, non-industrial character of the area. In particular, the proposal to implement clearcutting the Scenic Viewshed LUD is unacceptable. 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

⁵² Central Tongass Project Draft Environmental Impact Statement at 3-293.

⁵³ (1) Alaska Department of Natural Resources, Division of Mining, Land & Water. 2000. “Central/Southern Southeast Area Plan” – [PDF](#) – at 3-127 (explaining that the area is used extensively for fishing and hunting); (2) “UnCruise Alaska 7 Night Cruise - Fjords & Glaciers” (UnCruise Adventures – [link](#)); (3) “Thomas Bay - Alaska Traveler Stories” (Adventure-Life.com - [link](#)); (4) “Preserving our past, protecting our future” (UnCruise Adventures – [PDF](#)).

⁵⁴ *Cascadia Wildlands*, 937 F.Supp.2d at 1274, 1284.

⁵⁵ Central Tongass Project DEIS at 3-287-3-288.

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.⁵⁶

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.⁵⁷ Over three decades ago, during the 1996 Forest Plan revision process, the Forest Service identified a negative public perception of clearcuts - "[a]lmost all of those who commented on harvest methods were opposed to the continuation of clearcutting in the Tongass National Forest Commenters found clearcuts unappealing and unsightly."⁵⁸ According to Pacific Northwest forester John Bliss:

Social research focused on public aesthetic judgments of forest practices has overwhelmingly concluding that Americans find clearcutting aesthetically offensive. Most research on scenic beauty assessment finds that forest scenes rated high in aesthetic quality contain large trees, low to moderate stand densities, grass and herb cover, color variation, and multiple species. Scenic beauty is reduced by small trunks, dense shrubs, bare ground, woody debris, and evidence of fire or other disturbance.⁵⁹

Bliss' findings are consistent with academic studies that consider the growth of nature-based tourism in areas formerly dominated by timber development:

Forest preference studies conclude that people appreciate mature forests with good visibility, some undergrowth and a green field layer with no signs of soil preparation. Forests are thought to be in their natural state, or that look natural and bear no visible traces of human activity are usually preferred. Correspondingly, the view after clearcuts is the least preferred environment. In particular, the large size of the regeneration area and direct traces of cutting, such as signs of soil preparation and

⁵⁶ TLMP FEIS at 3-389-3-390.

⁵⁷ Ahtikoski et al. 2011. Potential trade-offs between nature-based tourism and forestry, a case study in northern Finland. *Forests* 2011, 2: 894-912.

⁵⁸ Bliss, J.C. 2000. Public perceptions of clearcutting.

⁵⁹ *Id.*.

logging residues, have a negative impact. Furthermore, on average, people do not prefer dead or fallen trees.⁶⁰

4. Cumulative effects

The NEPA analysis will also need to consider activities by other landowners in the areas. The analysis must do more than merely list other projects, but instead provide specific factual findings.⁶¹ New legislation proposed in Congress to address Alaska Native land claims would significantly alter landownerships in the project area and transfer ownership of second-growth forests currently managed by the Forest Service.⁶²

5. Public health and safety

The Thomas Bay project entails a “high risk” of introducing invasive plant infestations due to road construction activities which will add to the acreage already affected in the project area.⁶³ The EA needs to discuss how this added risk and the Forest Service’s controversial plans to treat infestations with glyphosate affects public health and safety and adds to the cumulative impacts caused by this project. proposed Wrangell-Petersburg Invasive Plant Management project would authorize the Forest Service to spray herbicides anywhere in the Petersburg Ranger District with no annual treatment limit. The Forest Service would use three herbicides, including a carcinogenic, non-selective herbicide, glyphosate. Forest workers would spray herbicides in riparian areas, estuaries, on waterbodies, exposing the environment to harmful chemicals and themselves to significant cancer risks.

The invasive plant project would spray an identified carcinogenic chemical – glyphosate - around campgrounds, trails and anadromous streams. There are substantial questions about the environmental impacts associated with glyphosate. In 2015, the International Agency for Research on Cancer identified glyphosate as a human carcinogen and likely cause of non-Hodgkins lymphoma. The International Agency for Research on Cancer’s monograph also identified carcinogenic impacts on animals and other adverse effects to fish. Other recent studies have identified effects to insects and amphibians. Also, glyphosate is a non-selective herbicide and kills native plants that may not be able to recolonize habitat once eradicated due to competitive disadvantages relative to other plant species.

The International Agency for Research on Cancer’s monograph explains that “[g]lyphosate is a broad-spectrum, post-emergent, non-selective, systemic herbicide, which effectively kills or suppresses all plant types, including grasses, perennials,

⁶⁰ Tyrvaainen, L, H Silvennoinen & Ville Halliakainen. 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

⁶¹ *Bark et al. v. U.S. Forest Service*, 958 F.3d 865, 872-73 (9th Cir. 2020).

⁶² U.S. Senate maps of the proposed Tongass NF land transfer to Native corporations in five communities – [link](#).

⁶³ Central Tongass Project DEIS at 3-237.

vines, shrubs and trees.”⁶⁴ The International Agency for Research on Cancer’s 2015 monograph found that glyphosate:

- penetrates soil, air, surface waters, groundwater and food;
- breaks down in soil but does not break down in water;
- enters surface waters not just through direct application but also through atmospheric deposition and run-off;
- is detectable in tested fruits and vegetables;
- has immunosuppressive effects on studies fish species, meaning that it reduces their ability to fight infections and diseases;
- is carcinogenic for animals.

Other summary reviews of scientific studies show that:⁶⁵

- Glyphosate taken in by plants moves to the part of the plant used for food, such as wild blueberries;
- Juvenile fish are up to four times more susceptible to toxicity associated with glyphosate. Vegetation killed by glyphosate also increases stream temperature, which results in a corresponding increase in toxicity to fish such as juvenile salmon sensitive to temperature;
- Glyphosate use exacerbates the displacement effect of clearcutting on birds and small mammals;

Furthermore, the agency needs to re-evaluate the effectiveness of herbicide treatments. According to researchers, “[g]iven the paucity of published information and regular use of non-selective herbicides, there is a critical need for land management agencies to assess non-target effects of the herbicide treatments they are implementing.”⁶⁶

The prevalent use of glyphosate also raises substantial questions about environmental effects because of its non-selective nature and danger of suppressing non-target native plants. The non-selectivity in turn creates the possibility that non-native plants will quickly recolonize a treated area due to a competitive advantage over native plants killed by glyphosate. Glyphosate effectiveness studies have focused on its effects on the target species over a short period of time, rather than impacts on native plants.

6. Thomas Bay is a unique ecological area

Thomas Bay has “unique” characteristics under 40 C.F.R. § 1508.27(b)(3) as a Southeast Alaska mainland area that supports diverse wildlife and fish species and human activities. Most of the clearcutting occurred between 1958 and 1975 and the

⁶⁴ International Agency for Research on Cancer, World Health Organization. 2017. IARC Monographs on the evaluation of carcinogenic risks to humans. Some organophosphate insecticides and herbicides Volume 112. Lyon, France. Available at: <https://publications.iarc.fr/549>

⁶⁵ We can provide a reference list or documents supporting these findings.

⁶⁶ Wagner, V., P.M. Antunes, M. Irvine & C.R. Nelson. 2017. Herbicide usage for invasive non-native plant management in wildland areas of North America. Journal of Applied Ecology 54, 198-204. Available at: <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2664.12711>

area has some of the oldest and most extensive stands of second-growth in the Petersburg Ranger District.⁶⁷

Thomas Bay is one of the most important ecological areas supporting Game Management Unit 1B wildlife populations.⁶⁸ Most of the high quality habitat in Unit 1B is the narrow area of forested landscape between the saltwater and coastal mountains. The large river valleys, including the Thomas Bay drainage, are the limited areas that support larger salmon runs and bears.⁶⁹

Sitka black-tailed deer inhabit mainland areas in low densities except for isolated pockets, which include Thomas Bay.⁷⁰ Thomas Bay hosts an isolated moose population which occupies some of the most heavily logged areas.⁷¹ Petersburg residents rely on deer hunting opportunities in the project area due to the earlier closure of Unit 3 islands west of the mainland and because of recent population and harvest declines in the northern Unit 3 islands.⁷² Petersburg residents also rely on moose hunting in the project area, although declining populations are forcing moose hunters to seek out other areas.⁷³

7. The EA must consider whether the action establishes a precedent for future actions with significant effects or represents a decision in principle about a future consideration

We request that the NEPA analysis also consider “[t]he degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.”⁷⁴ The proposed action for this project represents a commitment as to how the Forest Service will manage recovering, second-growth forests in the Petersburg Ranger District. This proposed action opts for intensive clearcutting rather than allowing most of the federal second growth to succeed to an old-growth state.

Defenders request that the Forest Service reconsider its aggressive approach to second growth logging on the Petersburg and Wrangell Ranger Districts and assess the value of allowing those forests to recover to the point of attaining some old-growth habitat features of value for wildlife. Uncut or lightly treated second-growth forests can have some value for wildlife despite the limited availability of biological characteristics associated with old-growth forests. In particular, wildlife will utilize second-growth forests in areas where there is a deficit of preferred habitats. Maintaining these recovering forests would have multiple benefits to wildlife by reducing edge effects, extending the size of forested acres, enhancing interior habitat,

⁶⁷ Central Tongass Project Draft Environmental Impact Statement at 3-62, Table 11; Lowell, R.E. 2018. Moose management report and plan, Game Management Unit 1B.

⁶⁸ Lowell, R.E. 2017. Wolf management report and plan, Game Management Unit 1B: Report period 1 July 2010-30 June 2015, and plan period 1 July 2015-30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2017-6, Juneau.

⁶⁹ Lowell, 2014. Unit 1B black bear management report.

⁷⁰ Lowell, 2015. Unit 1B deer.

⁷¹ Lowell, 2018. Moose management report and plan, Game Management Unit 1B.

⁷² Lowell, 2015. Unit 1B deer.

⁷³ Lowell, 2018. Moose management report and plan, Game Management Unit 1B.

⁷⁴ 40 CFR § 1508.27(b)(6).

reducing blowdown risks, reducing disturbances of nesting and breeding areas and providing refugia.

Plans for massive clearcutting of maturing second growth forest fail to meet the long-term wildlife viability need to allow for a mix of forested habitats. The delay of the forest recovery process, displacement caused by logging activities and impairment to travel corridors will have significant long-term adverse effects that the DEIS must disclose and evaluate.

Many older second-growth stands would recover fully into the understory re-initiation stage over the next 40 to 50 years. However, this project would delay this recovery process so that clearcut second-growth forests would require another half century to reach the same inhospitable stand conditions present today, and at least a century to recover into understory re-initiation structure. The NEPA analysis needs to disclose and consider whether this planned plantation rotation of 100 to 110 year-old (or younger) stands would prevent the development of quality wildlife habitat and thus increase long-term species extirpation risks.

III. Comments on the Purpose and Need and Range of Alternatives

A. The Actual Purpose and Need is Overly Narrow

The preliminary purpose and need for the project stated in the scoping letter are narrow, duplicative and timber-driven – the agency seeks to manage the area for timber production and increase the amount of second-growth for sale to meet two Forest Plan objectives: O-YG-01 & O-YG-02. Objective O-YG-01 seeks to make second-growth 50 percent of the annual sale offering. The NEPA analysis needs to explain why 22 MMBF is necessary to meet this objective given the decline in the old-growth timber sale program. O-YG-02 is duplicative - to “offer increasing annual volumes of young growth timber. These goals and objectives resulted in a project proposal for massive clearcuts that would only attract one large timber sale purchaser/exporter.

The Forest Service should expand the purpose and need for this project to enable the development of downscaled alternatives. Other Young-Growth Forest Plan goals could include “*maintaining* or improving habitat conditions for wildlife and fish” or supporting a variety of mill sizes and operators, through small and micro sales. The Forest Plan also directs the agency to “maintain, prolong, and/or improve understory forage production and to increase the development of old growth characteristics in young-growth timber stands for a variety of wildlife species” including emphasis on deer and moose winter range and areas that are important and accessible for human consumptive and non-consumptive wildlife uses.⁷⁵

B. NEPA requires a broader range of alternatives

The scoping letter identifies only two alternatives - the proposed action – 835 acres of clearcuts, mostly in large, contiguous units – and the no action alternative. NEPA imposes an obligation to “[r]igorously explore and objectively evaluate all reasonable alternatives.”⁷⁶ An agency must “consider such alternatives to the

⁷⁵ Forest Plan at 4-93.

⁷⁶ 40 C.F.R. § 1502.14(a); see also *Barnes v. U.S. Dep’t. of Transp.*, 655 F.3d 1124, 1131 (9th Cir. 2011)(“Congress created NEPA to protect the environment by requiring that federal agencies carefully

proposed action as may partially or completely meet the proposal's goal," meaning that it is reasonable to consider alternatives that meet other objectives.⁷⁷ A "reasonable" range of alternatives includes alternatives "that are practical or feasible" and not just those alternatives preferred by the agency.⁷⁸ The key criterion for determining whether a range of alternatives is reasonable "is whether an EIS's selection and discussion of alternatives fosters informed decisionmaking and informed public participation."⁷⁹

While an EIS need not include every conceivable alternative, "[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate."⁸⁰ The exploration of alternatives to an agency's preferred course of action is critical, because "[w]ithout substantive, comparative environmental impact information regarding other possible courses of action, the ability of an EIS to inform agency deliberation and facilitate public involvement would be greatly degraded."⁸¹

The Forest Service needs to consider a different and downscaled action alternative. In *Curry v. U.S. Forest Service*, the agency considered only two alternatives for the Mortality II timber project - a no-action alternative and the proposed action which involved "the overwhelming use of even-aged management techniques."⁸² The court explained that:

"In the court's extensive research in connection with plaintiffs' claims under the NFMA and NEPA, the court did not find one case in which the Forest Service had considered so few alternatives. Although the LRMP for the Allegheny National Forest indicates that even-aged management will be the "featured" silvicultural system for Management Area 3, this provision does not, in the court's opinion, negate the obligation of the Forest Service under NEPA and its implementing regulations to consider a 'broad range of reasonable alternatives' for the Mortality II Project, some of which involve more extensive uneven-aged management techniques."⁸³

There have been several recent cases recognizing that the mandate to "examine all viable and reasonable alternatives" means that timber agencies must develop multiple alternatives for timber projects – particularly alternatives that include retaining higher volumes of older and larger trees.⁸⁴ The only action alternative

weigh environmental considerations and consider potential alternatives to the proposed action before the government launches any major federal action").

⁷⁷ *City of New York v. U.S. Dep't of Transp.*, 715 F.2d 732, 742-742 (2nd Cir. 1981).

⁷⁸ Council on Environmental Quality (CEQ), Forty Most Asked Questions, Questions 2A and 2B; 40 C.F.R. §§ 1502.14, 1506.2(d); available at <http://ceq.hss.doe.gov/nepa/regs/40/40p3.htm>.

⁷⁹ *Westlands Water Dist. V. U.S. Dep't of Interior*, 376 F.3d 853, 872 (9th Cir. 2004)(citations omitted).

⁸⁰ *Id.* at 868; *Vermont Yankee Nuclear Power Corp. v. NRDC*, 435 U.S. 519, 551 (1978).

⁸¹ *New Mexico ex rel. Richardson*, 565 F.3d 683, 708 (10th Cir. 2009)(citations omitted).

⁸² *Curry v. Forest Service*, 988 F.Supp. 541, 553 (W.D. Penn. 1997).

⁸³ *Id.* at 553-554.

⁸⁴ See *Conservation Congress v. U.S. Forest Service*, 235 F.Supp.3d 1189, 1210-12 (E.D. Cal. 2017)(ruling that the Forest Service violated NEPA by considering only the proposed action and no action alternative and failing to consider an alternative that would have preserved more large diameter

drives at one result – intensive clearcutting of recovering forests. The alternative provides no opportunity for the public to compare and provide comments on alternatives that would allow for the retention of forested habitat that is essential to maintaining at-risk fish and wildlife populations and reducing significant harm to socio-economic sectors that depend on those resources.

It is clear that the Forest Service also has an obligation under NFMA to consider alternatives to clearcutting for this project.⁸⁵ The only applicable Forest Plan justifications for clearcutting are to achieve timber production objectives or where there is a risk of infection or disease, or high risk of windthrow.⁸⁶ Timber production considerations do not justify clearcutting. The Forest Service has previously found that uneven-aged management (generally, 67% forest retention) would produce more timber from the area over time.⁸⁷ Windthrow risks do not justify clearcutting as the agency has also stated that uneven-aged management, whether group or single tree selection, creates a mostly wind firm retention level.⁸⁸ Finally, the commercial young-growth stands in the Petersburg Ranger District “are mostly healthy and growing well with no foreseeable insect or disease issues.”⁸⁹

Prior planning on this project as part of the larger, cancelled Central Tongass Project indicated that the agency has previous work already done that would inform the development of a downscaled alternative to address wildlife design concerns.⁹⁰ The agency could consider an alternative, for example, limited to uneven-aged management through group or single tree selection that would provide timber to smaller operators while retaining 67 percent of the stand area.⁹¹ This alternative would at a minimum enable the retention areas to advance from late stem exclusion to understory re-initiation structure over the next three decades.⁹² While the agency’s “uneven-aged management” scheme entails cutting another third of the stand in 30 years, this alternative could provide flexibility for future forest managers to defer or cancel future planned cutting and better provide for long-term wildlife needs as the retention areas would be trending toward old-growth structure by that time.⁹³

Also, the Forest Service should consider the need for alternative treatments in the project area and the extent to which habitat enhancements are necessary to “[p]rovide the abundance and distribution of habitat necessary to maintain viable

trees); *Oregon Wild v. Bureau of Land Management*, Case No. 6:14-CV-0110AA (D. Or. 2015) (rejecting the agency’s contention that it only needed to consider one alternative with less environmental impact than the proposed project and ruling that the agency violated NEPA by failing to consider an alternative that retained a higher volume of older and larger trees).

⁸⁵ See 16 U.S.C. § 1604(g)(3); *Avers v. Espy*, 873 F.Supp.455 (D. Colo. 1994); *Curry v. Forest Service*, 988 F.Supp. 541, 554 (W.D. Penn. 1997).

⁸⁶ Forest Plan at 4-68.

⁸⁷ Central Tongass Project Draft Environmental Impact Statement at 3-230.

⁸⁸ *Id.* at 3-233.

⁸⁹ *Id.* at 3-227.

⁹⁰ *Id.* at 3-62, Table 11.

⁹¹ *Id.* at 3-221.

⁹² *Id.*

⁹³ *Id.*

populations of existing native and desirable non-native species well-distributed in the planning area.”⁹⁴ The agency’s own research indicates habitat objectives in non-development LUDs for deer that combine snow interception with forage.⁹⁵ Due to the general lack of forested habitat on the mainland, higher snowfall accumulations, and poor condition of the second-growth forest in the project area, the Forest Service needs to consider alternatives to clearcutting - and even to uneven-aged management – that aim solely at wildlife habitat objectives in the development LUDs.

The agency thus should consider treatments that can improve recovering forest characteristics for old-growth associated wildlife – both in the short term and the long term. As noted in the agency’s own reports, the relevant time frames for analysis should be “years to decades and multiple decades to centuries, respectively.”⁹⁶ Short-term benefits may pertain to understory vegetation and plant species diversity, while long-term objectives could be more rapid attainment of old-growth conditions.⁹⁷

The NEPA analysis should include a wildlife enhancement alternative that begins with field research efforts to inform potential treatments. Local wildlife managers have indicated that habitat enhancement is the only way to prevent further decline of moose habitat.⁹⁸ The Alaska Department of Fish and Game recommends “cutting back mature climax deciduous vegetation and maintaining it in an early stage of succession to provide shorter browse plants which are more useable as moose forage may be a better moose range enhancement practice for declining habitats than clearcutting conifer stands.”⁹⁹ The identification of major browse areas and winter browse areas could inform the selection of potential enhancement sites.

It is unfortunate that the Tongass Advisory Committee developed wildlife treatments only for non-development LUDs in the 2016 Forest Plan. However, it seems highly appropriate here to consider wildlife needs in the timber LUDs given the lack of forested area on the mainland and include alternative treatments using very small openings and “designed to improve the development and diversity of understory plants for wildlife including deer, create more structural diversity, and enhance snow interception by promoting tree crown development.”¹⁰⁰

In sum, we request that you develop substantially downscaled alternatives that respond to other multiple use values by: (1) eliminating any clearcutting in the Scenic Viewshed LUD to address scenic values and reduce adverse impacts to hikers, hunters and other visitors and (2) if commercial timber take is part of the project, there must be an uneven-aged management alternative and (3) there should be an alternative aimed narrowly at wildlife habitat enhancement.

⁹⁴ Forest Plan at 4-85.

⁹⁵ Bennetson, B. 2020. Tongass National Forest young-growth management guidelines for stands with a wildlife management objective. Exh. 3 of the Tongass Young-Growth Management Strategy, USDA Forest Service, Tongass National Forest, Juneau, AK. 86 pp.

⁹⁶ *Id.*

⁹⁷ *Id.*

⁹⁸ Lowell, 2018. Moose management report and plan, Game Management Unit 1B.

⁹⁹ *Id.*

¹⁰⁰ Central Tongass Project Draft Environmental Impact Statement at 3-85.

IV. Conclusion: Cancel clearcutting

We request that you cease planning on the proposed action. As currently proposed, an EIS is necessary to address significant adverse impacts.



Larry Edwards, for:

Becky Knight, President

Attachments (non-USFS or documents unlinked in footnotes):

Ahtikoski et al. (2011).

Bliss, J.C. (2000).

Gilbert et al. (2017).

Hanley et al. (1989).

Lowell (2014, 2015, 2017, 2018)

Person & Brinkman (2013).

Tyrvaainen et al. (2016).