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

**Re: Thomas Bay Young-Growth Timber Sale Project**

ID Team Leader Case:

Established in 1947, Defenders of Wildlife is a national nonprofit conservation organization dedicated to the protection of flora and fauna in its native habitat. Defenders has nearly 2.2 million members and supporters nationwide, including over 6000 in Alaska. We have long advocated for the conservation of wildlife and habitat on Alaska's public lands, including the Tongass National Forest. Defenders appreciates this opportunity to comment on the above-referenced project.

We applaud the USDA's July 15, 2021 announcement of a new sustainability strategy for southeast Alaska focused on restoration, recreation and resilience, and ending large-scale old-growth logging in the Tongass. We understand that it may take some time for the agency to reorient its resources and priorities to accomplish this shift in management focus.

It is important that this very welcome and appropriate shift is evident in the projects that the Forest Service proposes, and the agency should ensure that the proposed project aligns with its new sustainability strategy. The project purpose and need as currently expressed does not appear focused on the new goals of restoration, recreation and resilience, and the agency should consider expressly incorporating project components designed to achieve them. It should also consider modifying the stated purpose and need to explicitly reflect its new management focus.

The agency should consider the proposed project and a range of reasonable alternatives in a NEPA document that incorporates public input. Particularly as the first project rolled out since the July 15 USDA announcement, it is important to have a transparent assessment of the project's goals and impacts, and of alternative ways of meeting those goals.

The Forest Service should ensure that it undertakes meaningful consultation with tribes on this and all projects impacting the forest. This is already required by law in accordance with the Nation-to-Nation relationship between the United States and Tribal Nations. In its July announcement, USDA further committed to prioritizing robust and meaningful consultation in the Tongass as part of a renewed focus

on its trust obligation to tribes. We encourage you to carry that commitment through for this project and to thoughtfully consider the input provided during the consultations.

We are especially interested in the promise of a new, stronger focus on restoration because of the potential to create better conditions for wildlife in the forest. Decades of habitat destruction and fragmentation have unfortunately created a legacy of poor wildlife habitat over expansive areas. A new concerted and determined effort to restore habitat can improve these conditions for wildlife over time, and potentially employ significant numbers of local people to do the work.

As proposed, however, this project would return the area to the conditions following the original habitat destruction and provide little restoration benefit. The Forest Service should address now, at the outset of a new era focused on restoration, recreation and resilience, how it views its work moving forward in the extensive young-growth stands in the Tongass. Production of forest products can certainly be a part of that work, and project analyses should evaluate the associated local economic benefits. Clearcutting large areas again at scale, however, will frustrate rather than promote wildlife habitat restoration and an earlier return to favorable conditions for wildlife, especially old-growth dependent species. The Forest Service should explicitly assess whether and how the alternatives it considers will promote its restoration, recreation and resilience goals.

Finally, in considering project alternatives to clearcutting, we encourage you to incorporate your Wolf Habitat Management recommendations into the designs. These were developed in 2017 but have not necessarily been implemented at the project level. Wolves and deer are among the species that will benefit greatly from a new focus on wildlife habitat restoration and are of significant public interest. Both of those species and others will benefit from applying the recommendations to this and other projects in young growth moving forward.

We encourage you to be deliberate about this first project as it could set an important tone for public expectations and discourse around the Forest Service's new and critical focus on sustainability.

Sincerely,

/s/

Pat Lavin  
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