



Southeast Alaska Conservation Council

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October 20, 2022

Thorne Bay Ranger District
Attn: Thorne Bay Basin Integrated Management Project
P.O. Box 19001
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Transmitted electronically: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=62854>

Mr. Pentecost,

Please consider the following comments on behalf of Southeast Alaska Conservation Council (SEACC) regarding the scoping document and associated public comment period for the Thorne Bay Basin Integrated Management Project. The project proposes to log up to 150 million board feet of young-growth timber over a 15-year period, conduct commercial and pre-commercial thinning operations, construct or reconstruct 49 miles of road, and implement restoration activities over a large area on the eastern side of Prince of Wales Island (POW). An Environmental Assessment (EA) is planned. The project area is mostly inside Tongass National Forest boundaries, and is 91,173 acres in size, with 3,595 acres outside National Forest System ownership.

Based in Juneau, Alaska (Tlingit/ Áak'w Kwáan lands), SEACC is a regional grassroots organization with over 7,000 supporters. For over 50 years, SEACC has been bringing together diverse Alaskans from our region's communities to protect the natural resources of Southeast Alaska, ensure sound stewardship of the lands of the region, and protect subsistence resources and traditional ways of life side-by-side with fishing, tourism, and recreation.

The Forest Service should clarify and tighten the Basin project's alignment with SASS in the EA

When the United States Department of Agriculture introduced the Southeast Alaska Sustainability Strategy (SASS) to the Tongass National Forest in 2021, it was described as an effort to integrate timber management with other forest management activities, in part:

This SASS Forest Management strategy describes an integrated approach to shift from a singular objective of timber management to integrated management actions that include terrestrial and aquatic restoration, young-growth timber management, and small and micro old-growth timber sales. Within the framework of the 2016 Tongass Land and Resource Management Plan (Forest Plan), the Forest Service will intentionally design integrated forest management projects that support a diverse economy, enhance community resilience, conserve natural resources, and retain climate-resilient forests. The Forest Service will also address limitations in workforce capacity, industrial and community infrastructure, and agency policies in order to plan and implement projects more efficiently. This SASS Forest Management strategy aims to strengthen the ability



of the Tongass National Forest, Tribal Nations, and other partners to collaboratively manage natural resources for the benefit of Southeast Alaska.¹

Relative to forest management, the Thorne Bay Basin Integrated Management project may align with the intent and direction of SASS and with a transition to a young-growth timber industry. However, the lack of detail at this stage makes it difficult to identify whether the project aligns as well with other components of SASS or with other important management mandates or recommendations. SASS emphasizes support for a diverse economy and community resilience. How will the Basin project accomplish those objectives on Prince of Wales? This is the first large young growth project under the SASS, under the 2016 Forest Plan, and perhaps ever on the Tongass. It could be considered the flagship project of a new era and will guide the management of a significant area on POW for as long as a Forest Plan.

We, therefore, urge the Forest Service to take the time to get this right, to carefully consider public comments (including and specifically those of Alaska Native communities), to analyze in detail a range of alternatives (not just the proposed action), and to build in a learning component (a robust, detailed monitoring program with regular disclosure to the public). The Basin project could become a precedent-setting example of transitional young-growth timber industry which is more sustainable, with smaller young-growth sales going to local operators over longer periods of time. Those operators will process the wood locally. A discussion among state and federal forestry managers about potential legislation that would allow small operators to grade and stamp their own lumber is taking place currently and may open up markets and opportunities for a genuinely local, small-scale young-growth timber industry.²

The Tongass National Forest 5-Year Timber Sale Schedule 2022-2026 notes a projected young-growth harvest of 14 million board feet (MMBF) for Prince of Wales Island for 2023.³ The scoping document states that this project is projected to “provide an annual average of 7-10 MMBF of suitable young-growth timber ...” Does the 2023 figure from the TNF 5-Year Timber Sale Schedule include projected annual young-growth harvest estimates from this project? If so, that should be made clear in the EA. If not, SEACC would like additional information on where the projected young growth in the schedule is coming from.

The Forest Service should clarify site-specific, measurable goals for logging, thinning, and restoration in the EA and add the best available data regarding pre-commercial thinning benefits to wildlife

¹ USDA Forest Service. SASS. (2021).
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1060642.pdf

² State of Alaska Division of Forestry. (September 23, 2022). Zoom Webinar. *Local Lumber Grading Stakeholder Meeting*.

³ USDA Forest Service Tongass National Forest (2021). TNF 5-Year Timber Sale Schedule.
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd977797.pdf



In the SASS guiding document, the USFS states that forest management will include updates to subsistence data, invasive species management, stream crossing improvements, culverts, and pre-commercial thinning in young growth. Specific thinning goals Forest-wide are defined at 8,000 ac/year; restoration goals at 1,400 ac/year.⁴ In the scoping document for this project, an overarching goal of 2,800 acres of “terrestrial habitat treatments” is defined, but no annual figure is estimated.⁵ Does that figure include other restoration work in the project area, such as culvert replacement or large woody debris placement in streams?

SASS identifies restoration byproducts as potentially beneficial for biomass facilities. There are such facilities on POW. The USFS should include a plan in the EA to make use of byproducts from restoration work and if possible, from thinning or logging for biomass recovery. The Forest Service should include cost recovery data regarding the use of biomass from the proposed project area. The Forest Service should also disclose the carbon impacts of the reasonably foreseeable end use of young growth logging, especially if that includes biomass combustion.

It is not clear that certain types of thinning are beneficial to wildlife in all circumstances. The 2014 Tongass Young Growth Management Strategy refers to the 2007 Prince of Wales Young-Growth Management Plan — an effort to “identify high priority young-growth areas for treatment on National Forest System lands which would provide the greatest benefit for Sitka black-tailed deer, other wildlife, and for people who use them.” The Forest Service should include any data from that study that pertains to the proposed project area. Because of the importance of deer on POW as a subsistence resource, and the fact that managers have acknowledged deer are declining on POW due, in part, to habitat loss,⁶ thinning young-growth is an area of intense public interest and every effort should be made to understand potential benefits to deer. SEACC has questions about pre-commercial thinning (PCT) in terms of duration and level of benefit as far as canopy openings. According to a Tongass young-growth study related to deer habitat, thinning after a stand had reached 35 years of age or more was “least effective” when compared to earlier treatments.⁷ The study offers some cautionary statements about treatments:

For stands that have not been thinned before reaching the relatively large tree sizes typical of ages greater than 35 years, thinning by girdling might be an effective treatment, but careful contract administration is essential when using girdling as a management tool. When girdling is done by chainsaw, too deep a cut leaves the tree with too small an intact bole to sustain wind or snow loads.⁸

⁴ USDA Forest Service. SASS. (2021).
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1060642.pdf

⁵ USDA Forest Service. (2022). Thorne Bay Basin Integrated Management Project Scoping Document at 3.

⁶ See Alaska Dep’t of Fish and Game, Sitka Black-tailed Deer,
<https://www.adfg.alaska.gov/index.cfm?adfg=deer.printerfriendly>

⁷ Hanley et al., 2013.

⁸ *Id.*



The Forest Service should include more detailed information about specific treatments planned in the project area, and where and how it intends to use them. The Forest Service should also include mapped data about previous thinning or pre-commercial thinning projects in the area in the EA. Additionally, the Forest Service should include some detail on how it plans to administer the contracts associated with this work to accomplish certain treatment goals, and how that may differ from previous contract administration.

The Forest Service should include as part of the proposed action a mandate that the agency issue regular reports on restoration activities associated with this project, and adopt a comprehensive monitoring plan to understand the project's effectiveness in terms of habitat use by deer and other wildlife. As restoration is the emphasis now for the Tongass, it is important to build an understanding of and awareness about the benefits of these projects to learn whether, how, and how quickly they improve habitat and watershed function over time. It would also be helpful if, as part of any monitoring plan, the Forest Service designated control stands within the project area against which to compare the project's effectiveness. SEACC supports restoration goals and we are encouraged to restore as a major part of this proposed project.

The Forest Service should include specific details in the EA about how it plans to align the project in terms of SASS's direction on workforce development, development of the local young-growth industry, and economics of young-growth sales

The scoping document lacks detail about how this project will ensure that young-growth trees, once harvested, become value-added, locally processed wood. SASS includes numerous references to providing local employment, developing restoration economies, and assisting local operators with funding.⁹ The scoping objectives do not mention specific ways this project will reach out to employ POW residents through workforce development.

The Forest Service should include details in the EA about strategies it will employ to hire as many local people as possible in the restoration and thinning pieces of the proposed project work. This is an ideal project which can align even more closely with SASS if it involves a coordinated and vigorous effort to employ local businesses and individuals. We have seen the POW Forest Service create agreements with Tribal entities for work on previous restoration projects and we support these efforts.

In the SASS Forest Management document, a policy need was identified in terms of achieving the goal of a forest transition to young-growth management:

"Provide specific exemptions to allow advertising young growth timber sales that may appraise deficit when using a residual value appraisal. This will improve flexibility in

⁹ SASS. (2021). pp. 2-4.



meeting community needs for low-value timber products such as biomass.”¹⁰

The Forest Service should disclose information in the EA about which exemptions may have been formulated to support the preceding statement from SASS, and which exemptions, if any, will be used to advertise this sale.

CONCERNS AND QUESTIONS

Roads

This project includes plans to re-open or construct about 150 miles of roads. Seven of those miles will be new road construction, along with re-opening 42 miles and “maintaining” 104 miles of National Forest System road.¹¹ We request that the EA provide detailed information on where these roads are and also, and to what extent the project can be accomplished without building new road sections, or building far fewer. Specifically, we request that the Forest Service consider in detail an alternative that reduces or eliminates new road construction and reconstruction. On Prince of Wales alone, there are already at least 2,800 miles of roads. Forest roads contribute to silting, turbidity and erosion and create stormwater runoff that impacts streams. The ecological damage attributable to roads is one of the key reasons that restoration is desperately needed on POW. Roads routinely contribute to the introduction of invasive species and fragmented habitats. The public has underscored the importance of Roadless areas on the Tongass by demonstrating overwhelming support for the reinstatement of the full protections of the Roadless Rule on the Tongass over the past few years.¹² The Forest Service should strive to minimize or eliminate new road construction with this project.

The Forest Service should also disclose in the EA whether the area will meet TLMP road density standards after new roads are built, and associated impacts on deer, wolves, and other subsistence resources. Wildlife Analysis Areas (WAAs) in the project area should be mapped and road density thresholds must be met.

Special areas of concern

How will the Forest Service address any areas identified through the EA analysis and/or through public comment as having special concern for forest users and stakeholders in the EA?

Development of the Environmental Assessment (EA) and alignment with POW Landscape Level Analysis (POWLLA)

POWLLA guidelines in terms of timber management have been struck down by the 9th Circuit Court. The only portion of the document that can guide this proposed project is the restoration

¹⁰ *Id.* at 5.

¹¹ *Id.* at 3.

¹² *Earthjustice et. al.* public comment Alaska Roadless Draft EIS. (December 16, 2019). P. 83.



and recreation portions, or other non-timber management pieces of the analysis. Therefore, the Forest Plan becomes the guiding document for the timber management components.

This EA must disclose the cumulative effects of the project when taken together with those of the POWLLA project, particularly the Big Thorne timber sale. There is a potential for cumulative impacts because of:

- Non-FS lands adjacent to the project area
- Fish and deer resources, especially deer, are already considered under threat here on POW due to decades of intensive timber harvest and existent stem-exclusion conditions around the island.
- Previous and recent federal logging (i.e., Big Thorne) in the area and associated impacts
- Plans for additional logging

The POWLLA Final Record of Decision states that:

*Commercial harvest in young-growth stands will use two-aged or uneven-aged management wildlife-centric prescriptions...[Prescriptions] will be designed to improve or maintain deer habitat and existing wildlife corridors.*¹³

The scoping document does not describe or propose specific harvest methods. It will be critical that the EA details the two-aged or other uneven-aged harvest prescriptions for each individual sale area. However, due to the fact that timber management components of the POWLLA have been struck down in court,¹⁴ TLMP guidance must apply. TLMP provides goals, objectives, and thresholds for young-growth logging. These include:

- Special recommendations for logging YG in riparian areas, including limitations of commercial thinning and maximum removal of 35% of the original stand¹⁵
- Special recommendations for managing young-growth stands in Old-Growth Habitat LUDs, including keeping road construction to a minimum (*Id.*).

It is notable that previously planned guidance for Prince of Wales young-growth logging included a harvest method stipulation.

The scoping document includes a map (Page 5, attached as a screenshot) that highlights the project area and delineates proposed harvest, wildlife treatments and corridors, and proposed watershed improvement areas. However, the map does not show existing old-growth in the project area. A map in the POWLLA Final Environmental Impact Statement (EIS) appears to show that significant areas within the project area are old-growth habitat (see attached

¹³ USDA Forest Service. (2019). POWLLA Final ROD at 3.

¹⁴ *SEACC, et.al., v. US Forest Serv. et.al.* (2020).

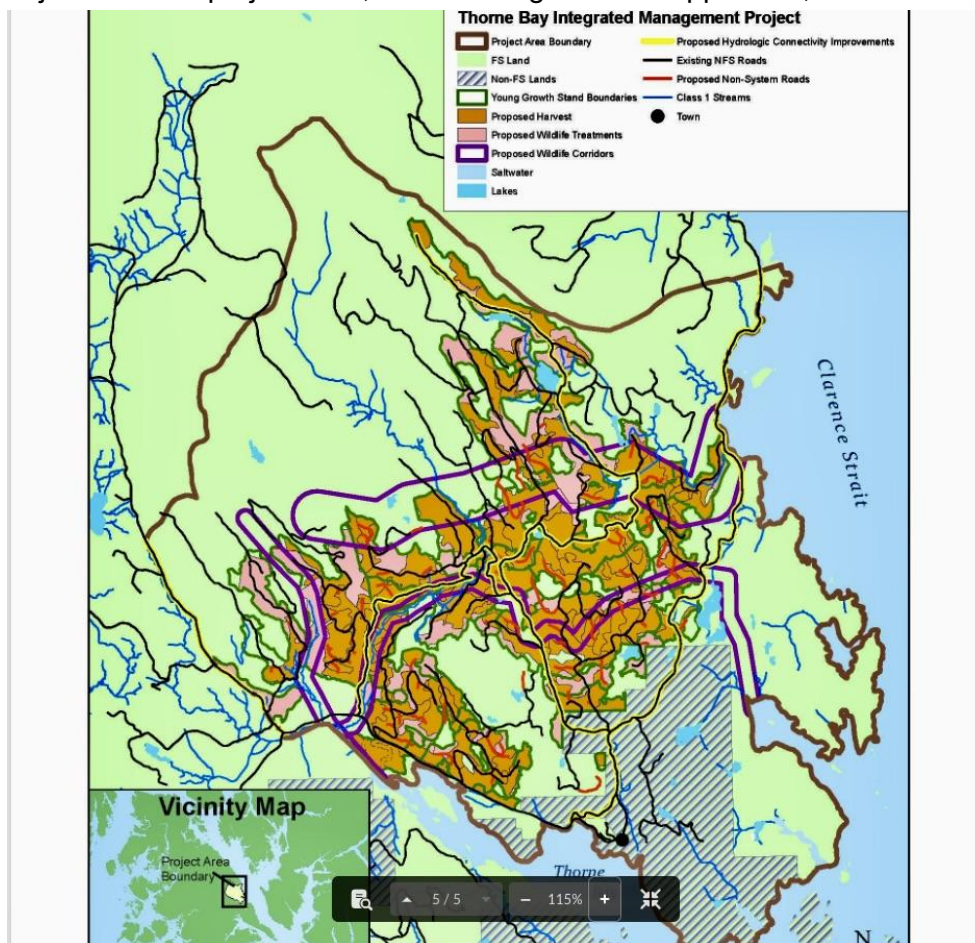
¹⁵ TLMP at Chapter 5, § 6.



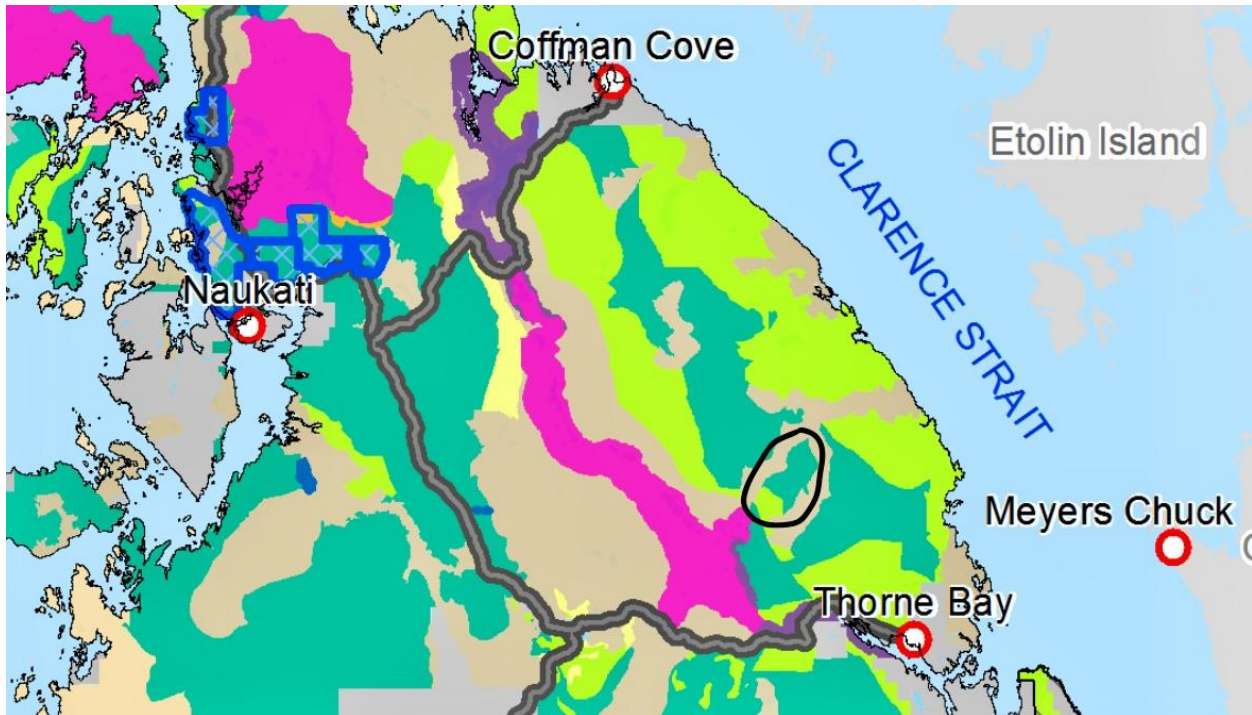
screenshot — old-growth areas are tan colored).¹⁶ The Forest Service should create a new map that clearly shows all Land Use Designations (LUD) and stand boundaries within the proposed project area. It's not entirely clear if the proposed harvest areas are immediately adjacent to old-growth habitat areas but it appears that way. The map from the POWLLA FEIS also shows that the proposed project area has LUD II (non-harvest) designation adjacent to it as well as one area of Scenic Viewshed designation to the northwest. More detail needs to be made clear about proximity and buffers between LUDs involved in the proposed project area.

In the map in the POWLLA FEIS, there is a “peninsula” of Modified Landscape/Timber Production land (see photo below). SEACC wants more information about plans for this area; if it is surrounded by old-growth habitat, as it appears, this area should *not* be re-harvested, but instead be left to organically create the wildlife corridor that naturally could exist here:

Please provide additional maps with more detail in the EA. This scoping map is missing key information like LUD designations, ownership of adjacent lands, age of logging of lands in and adjacent to the project area, habitat designations if applicable, and more:



¹⁶ POWLLA FEIS. (2018). § 1-9, Fig. 2.



Initial analysis of a map of the area with layers denoting years of harvest suggests that the oldest trees in the area are approximately 60 years old.¹⁷ The Forest Service should disclose sale economics for this and future young growth sales.

Thank you for the opportunity to comment on the Thorne Bay Basin Integrated Management Project. SEACC hopes to see more information and detail about logging methods, wildlife treatments and restoration, alternative/s without new roads which minimize reconstruction of old roads, and the requisite “hard look” at cumulative impacts associated with this project in the EA.

Respectfully,

Katie Rooks, M.S.
Environmental Policy Analyst

¹⁷ Trout Unlimited. (2022). [GIS map with Forest Service age of harvest layer for project area.]



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