



October 21, 2022

Mark Pentecost
Thorne Bay Ranger District
1312 Federal Way
P.O. Box 19001
Thorne Bay, Alaska 99919

Via: brian.pentecost@usda.gov

Re: Comments in support of Thorne Bay Basin Integrated Management Project #62854.

Dear Mr. Pentecost,

Please accept these comments on behalf of Trout Unlimited (TU) on the Thorne Bay Basin Integrated Management Project, #62854. 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, business owners, fishing and hunting guides, and commercial fishermen, among other various occupations. Many of TU's members live and work in the Tongass National Forest, 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 working collaboratively with the Forest Service and other stakeholders on the Tongass to complete watershed restoration projects, improve riparian habitat, remove and replace problem 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 caring for fish and wildlife habitat 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.

The Tongass is the nation's largest national forest, spanning 16.7 million acres that contain thousands of productive salmon, steelhead and trout streams. It produces more wild salmon than any other national forest, accounting for 25% of the entire commercial salmon harvest along the west coast.¹ The Tongass' abundant fish and wildlife, wild landscapes, and famed Inside Passage attracts throngs of visitors to catch wild salmon, view incredible scenery, and experience North America's largest remaining temperate rainforest. Fishing and tourism accounts for the lion's share of the regional economy, supporting 20% of all local employment² and contributing \$2 billion to the regional economy.

¹ U.S. Forest Service, *Tongass Salmon Factsheet* (Mar 2017) available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd554592.pdf.

² Rain Coast Data, *Southeast Alaska by the Numbers 2021*, prepared for Southeast Conference at 2 (Sep. 2021) available at <https://www.seconference.org/wp-content/uploads/2021/09/SE-by-the-numbers-2021-final.pdf?2070f3&2070f3>. Importantly, these sectors have room for growth. Employment in these sectors is down currently due to the effects of Covid-19, before which employment in seafood and visitor services accounted for

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 National Forest System, but is especially relevant in Southeast Alaska where the Tongass comprises such a large portion of the land base and where the forest's natural and roadless qualities play such an integral role in Southeast Alaska's businesses, economy and lifestyle. Maximizing the benefits from the Tongass to the public requires the Forest Service to manage the Tongass in a way that prioritizes the many contributions of fish, wildlife and visitor services.

We commend the U.S. Department of Agriculture (USDA) and Forest Service for the Southeast Alaska Sustainability Strategy (SASS). Trout Unlimited was especially heartened when the USDA announced that, "[a]s a key part of the Southeast Alaska Sustainability Strategy, USDA will end large-scale old growth timber sales on the Tongass National Forest and will instead focus management resources to support forest restoration, recreation and resilience, including for climate, wildlife habitat and watershed improvement."³ The Tongass is a globally important resource for its role slowing the impacts of climate change, with old forests storing ten times the carbon of young forests. Focusing the Forest Service's management resources on restoration, recreation, and resiliency is essential to it 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.

- I. The Purpose and Need is well aligned with the Southeast Alaska Sustainability Strategy and will help ensure this project meets the current and future needs of local and regional communities.

Trout Unlimited appreciates that the purpose and need for this project appears well aligned with the SASS. Designing this project so that it provides a diversity of opportunity, maintains biodiversity, restores biological and physical integrity, supports subsistence, and maintains the abundance and distribution of diverse habitats that sustain viable wildlife populations, will help ensure this project is consistent with the SASS and meets the immediate and long term needs of local and regional communities. Trout Unlimited supports the sustainable harvest of young growth forest products on the Tongass, including as part of this project, when done as part of a broad, comprehensive effort that serves the primary objectives of restoration, recreation or resiliency as outlined in the SASS.

For far too long, the purpose and need for many Tongass forest projects has focused on "the production of sawtimber" or "providing a reliable and predictable flow of commercial timber" to the exclusion of the many other goals and objectives in the SASS and Tongass Land Management Plan. Such projects too often have caused serious impacts to fish and wildlife, harmed the long-term productivity and diversity of the landscape, increased vulnerability to the impacts of climate change, and produced very few Alaska jobs since foreign workers often were employed to do the logging and much of the timber was exported with no or minimal local milling or processing.

Trout Unlimited is excited to see the Thorne Bay Basin Integrated Management Project conceived with a broader intent that we hope will help it provide meaningful benefits to the public and

26% of all regional employment. See Rain Coast Data, *Southeast Alaska by the Numbers 2019*, prepared for Southeast Conference at 5 (Sep. 2019) available at

<http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>.

³ <https://www.usda.gov/media/press-releases/2021/07/15/usda-announces-southeast-alaska-sustainability-strategy-initiates>

local communities, while also improving the function, productivity and resiliency of the project area. As the project progresses through the planning process, TU encourages the Forest Service to stay focused on the opportunity to restore the landscape, improve fish and wildlife habitat, promote recreation and cultural values, increase resiliency, and improve the project area's capacity for carbon storage.

II. The Forest Service should modify the proposed action to not include new road construction.

Some of the most serious and costly impacts to the Tongass have occurred as a result of road construction. Roads increase erosion and sedimentation of streams, disrupt the natural hydrology and function of a watershed, can block or impede migration of aquatic species, and are incredibly expensive to build, maintain and close. An astonishing 30% of the bridges and culverts along Tongass roads, more than 1,100 in total, fail to meet federal and/or state standards and impede fish migration to nearly 250 miles of spawning and rearing habitat.⁴

The proposed action for the Thorne Bay Basin Integrated Management Project includes the construction of approximately 6 miles of new temporary road and approximately 1 mile of new National Forest System road, along with the reconstruction of approximately 42 miles of decommissioned temporary road. Trout Unlimited encourages the Forest Service to modify the proposed action to eliminate all new road construction, whether for a temporary or system road, and to minimize the reconstruction of previously decommissioned roads. If the proposed action cannot be modified in such a manner, the Forest Service should develop and assess a new alternative that excludes these road construction activities.

III. Prescriptions for young-growth harvest should be designed to promote diversity and improve fish and wildlife habitat.

The proposed action includes the harvest of up to 5,800 acres of young-growth stands "using various sizes of timber sales over 10 to 15 years." However, very little information is provided in the scoping documents about what prescriptions will be implemented for these young-growth stands or how harvest will occur. Young-growth harvest may be done responsibly and in a manner that's consistent with the SASS, but the scoping documents do not include enough information for the public to know that that is the case.

In the absence of additional detail, TU encourages the Forest Service to design the young-growth treatments in a way that is consistent with the SASS' directive to "focus management resources to support forest restoration, recreation and resilience, including for climate, wildlife habitat and watershed improvement."⁵ Clearcutting large or even modestly-sized tracts of young-growth forest in a manner that creates even-aged stands, reduces productivity for fish and wildlife, decreases the recreational value of the landscape, or lessens the forest's ability to mitigate the impacts of climate change, should be avoided. Sustainable harvest of young growth forest products is appropriate as part of this project so long as the primary objectives of the project remain consistent with the SASS' focus on restoration, recreation and resiliency.

⁴ See USDA, *Tongass National Forest Fish Passage at Road-Stream Crossings Status*, (Mar. 2021) available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd935234.pdf.

⁵ <https://www.usda.gov/media/press-releases/2021/07/15/usda-announces-southeast-alaska-sustainability-strategy-initiates>

IV. Conclusion.

There has never been a better time for the Forest Service to invest in restoring our watersheds, improving forest health, and in managing our second-growth lands to improve fish and wildlife habitat and to help create resilient landscapes and communities. As this project develops further and more detailed information becomes known, TU encourages the Forest Service to provide additional opportunity for public input to ensure the project remains consistent with the SASS and serves the needs of the public. Trout Unlimited is excited for the Thorne Bay Basin Integrated Management Project and is eager to help make it a successful part of the SASS.

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 flourish at the end.

Austin Williams

Alaska Director of Law and Policy