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May 8, 2023

Ben Case  
Tongass National Forest, Petersburg Ranger District  
12 North Nordic Dr.  
Box 1328  
Petersburg, AK 99833

Via web portal: <https://cara.fs2c.usda.gov/Public//ReadingRoom?Project=60639>

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

Dear Mr. 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.

Based in Juneau, Alaska (Tlingit/Áak'w Kwáan lands), Southeast Alaska Conservation Council (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. We appreciate this opportunity to comment on the above-referenced project.

**General Comments**

We submitted scoping comments in 2021 and we appreciate the responsive changes we see, including the revised statement of project purpose and need and the development of two new alternatives more focused on habitat restoration. Specifically, the addition of "addressing restoration needs" to the project purpose and need is an important step in aligning the project with the Southeast Alaska Sustainability Strategy (SASS), as is the development of Alternatives 3 and 4, which are designed to improve wildlife habitat while also achieving the young growth timber production objective.

These new alternatives better promote the key SASS goal of wildlife habitat restoration than did the project as initially proposed (Alternative 2). Alternative 4 provides the best habitat quality and connectivity among the action alternatives and appraises positively for harvest. Alternative 2 produces the worst outcomes for wildlife habitat over time and would also fail to provide timber in a sustainable fashion, leaving future decades bereft of young growth timber supply from the project area. It would repeat the economic and ecological “boom and bust” cycle of the past and not reflect the sustainability and resilience goals that characterize the new management direction in the Tongass. Alternative 3 appears to trade some habitat quality and ecological integrity for a somewhat improved economic result, compared to Alternative 4. Of the action alternatives, we support Alternative 4 and view the habitat restoration components as necessary and appropriate to pursue with or without associated commercial young growth harvest.

#### Specific Comments

The following responds to specific sections or issues raised in the draft EA.

#### **Purpose and Need**

The project purpose is to provide an economic supply of young-growth timber while also addressing restoration needs in the area. Draft EA at 1. We support the integrated forest management actions described, such as restoring fish habitat, replacing a failed culvert, treating invasive plants, and thinning to improve wildlife habitat. Draft EA at 2. The latter is already authorized by the “Silviculture Treatment of Young Growth” Decision Memo dated December 8, 2021. That memo authorized thinning in 105,000 acres in the Petersburg and Wrangell Ranger District and anticipated annual treatments covering up to 5000 acres. Decision Memo at 1. Since Alternatives 3 and 4 stagger harvest over approximately 60 years and multiple stand entries, draft EA at 17, this project would presumably provide a prime opportunity to accomplish significant wildlife habitat treatments. The final EA should quantify the acreage to be thinned, explain the rationale for the location and acreage involved, and address the extent to which this project, combined with other restoration efforts in the district, can achieve the broader goal of improving wildlife habitat via thinning district-wide.

#### **Financial Feasibility and Employment**

No alternative is profitable with domestic timber processing; all are profitable if timber is exported. Draft EA at 32-33. Notably, 80-85% of the project’s direct employment income is maintained if the timber is exported rather than processed domestically, even though the projected jobs total 26-64 in the export scenario, about 67% of the 39-94 jobs associated with domestic processing. Draft EA at 33. The analysis would benefit from additional discussion about the employment and income, including where the processing would occur and the labor needs or projections associated with the different project components.

Financial considerations appear to have influenced the selection of the preferred alternative, and we recognize the inherent uncertainty associated with predicting timber market dynamics that underlie project feasibility. To our knowledge, however, the Forest Service’s draft EA represents the best estimation currently available and it shows Alternative 4 to be feasible. If the agency has doubts about that estimation holding true, then the final EA should attach confidence intervals to the estimates for

the alternatives or otherwise characterize the timber market variability it is taking into account in making this decision.

We understand that thinning has traditionally been accomplished by Forest Service staff, in contrast with harvesting which is done by others. While that may have been by necessity due to the lack of an available labor pool for thinning work, we wonder whether any new funding through recent legislation including the Bipartisan Infrastructure Act or Inflation Reduction Act may be available to support this project. If such funds are or may become available, then the final EA should address how they could be used. More fundamentally, if public funds are available to subsidize restoration work then the feasibility of restoration may not need to be tied to the latest timber market dynamics or appraisals.

### **Wildlife Habitat**

The draft EA states that Alternative 4 provides the best habitat quality and connectivity among the action alternatives. Draft EA at 39-40. Notably, it does the best job of leveraging the Point Agassiz small Old Growth Reserve in the project area by using uneven-aged management in all units adjacent to that OGR. Draft EA at 40. Openings in those units are limited to two acres, “facilitating the most connectivity through this part of the landscape and to the Muddy River drainage wildlife corridor.” Given that maintaining connectivity within and between OGRs is a critical component of the forest-wide Old Growth Habitat Conservation Strategy, it is appropriate to maximize the ecological function of the one OGR in the project area. Even if the Forest Service does not select Alternative 4 in its entirety, we urge the agency to adopt this approach to the units adjacent to the Point Agassiz OGR.

Alternative 3 employs uneven-aged management in only two units and generally allows 30-acre openings, three times the size of openings permitted under Alternative 4. For many species, the larger clearcut area results in greater impacts due to loss of thermal cover, hiding areas from predation, and some forage areas as well as difficulty with or avoidance to traversing open areas for some species.

Consideration of several specific species of interest further reinforces the importance of limiting opening sizes and maintaining connectivity. For example, “having a combination of smaller pockets of understory forage with cover and snow interception nearby would be particularly important to deer and moose in severe winters” and the prescribed uneven-aged management “would provide more fine-scale habitat heterogeneity with a higher level of structural diversity throughout the stands over time.” Draft EA at 40. Of the action alternatives, Alternative 4 would maintain the most thermal and hiding cover that deer and moose could more readily move through during periods of deep snow and the best balance of abundant forage in relatively small openings in the short-term and nearby thermal and hiding cover. *Id.* All of this best comports with the Mule Deer Working Group (Nelson *et al.* 2008) recommendations for deer winter range. *Id.*

Additionally, American marten would significantly benefit from Alternative 4 compared to the other action alternatives. Marten may avoid large openings particularly if they have no structure such as snags and logs. The young-growth stands to be harvested provide some thermal cover and ground-level structure that may support marten prey species (small mammals and birds) and provide some hiding cover for protection for avian predators such as great horned owls and barred owls. Draft EA at 43. Accordingly, alternatives with larger openings are likely to have greater impacts on marten and the smaller openings envisioned in Alternative 4 would have the least adverse effects. *Id.*

Similarly, flying squirrel populations are threatened by large expanses of disconnected or suboptimal habitat. Size and distance influence flying squirrel habitat use and dispersal from natal nest sites. Second growth and newly cut stands are energetically expensive habitats for squirrels as they necessitate farther travel between trees and less gliding capacity (Flaherty *et al.* 2010). The smaller gap size in Alternative 4 would be more beneficial for flying squirrels dispersing from Point Agassiz Old Growth Reserve into the project area.

Wolves also stand to benefit more from Alternative 4. We appreciate that Alternatives 3 and 4 appear to reflect the thinking and direction provided by the agency's Wolf Habitat Management recommendations (Wolf Technical Committee 2017). These recommendations align closely with the Forest Service's goal of accelerating the development of old-growth characteristics in young-growth stands, particularly for the benefit of deer and thus wolves, but also benefitting many other species. We encourage you to explicitly address, and apply to the extent feasible, some of the most relevant recommendations:

Commercial-Age Young Growth in Areas Where Succession Toward Old-Growth is a Dual Objective:

- Design treatments that provide understory deer forage and reduce effects of stem exclusion and slash to foster short-term habitat for deer, when such treatments can be done without compromising continued succession towards old-growth conditions that support long-term habitat for deer. Treatments could include variable-density thinning, thinning to favor dominant trees, creating small gaps and narrow openings, and pruning in areas with prior young-age thinning or adjacent to gaps.
- Avoid creating gaps and opening widths that are likely to result in a subsequent flush of conifer recruits and lose gap function that promotes understory forage; design gaps to be about 70 feet wide, adjusting as appropriate based on canopy height.

Commercial-Age Young Growth in Development (Timber Harvest) LUDs:

In areas with high potential for important deer winter range, rotate cutting of smaller units through time to accomplish the following:

- Sustained deer forage yield throughout rotations adjacent to intact canopy that provides snow interception and facilitates elevational movements by deer. The goal is to provide heterogeneity and provide deer foraging adjacent to movement corridors and thermal cover across the landscape through time.
- Plan rotations to provide a relatively constant supply of edges (or ecotones) between the most advanced young growth available (i.e., approaching or beyond economic maturity) and harvested stand in the shrub/forb stage of regeneration.
- Consider vulnerability to predation when designing sizes and shapes of multi-age-class-rotational configurations, decreasing deer vulnerability on flatter slopes by creating smaller and more dispersed treatments.

The final project should incorporate these recommendations to the extent possible and the final EA should address to what extent it will do so. It should also describe the sizes and shapes of the planned rotational configurations in the project area and resulting impact on deer vulnerability to predation in the future.

In addition to these young-growth management practices, the Wolf Technical Committee identifies road and den management approaches to minimize impacts to wolves. The key recommendations regarding roads are these:

- Avoid increasing road densities where total road densities (including temporary roads) exceed 0.7 miles per square mile
- Effectively close all roads that are currently administratively closed by omission from, meaning they are no longer included on, Motor Vehicle Use Maps

The draft EA notes a small increase in road density of 2-3% under all action alternatives but doesn't say what current density is or reference the 0.7 miles/square mile standard. Draft EA at 42. The final EA should disclose existing and estimated road density under each alternative and address whether the road density goal can and should be achieved. It should also address the applicability of the second bullet above.

Regarding wolf den management, the Wolf Technical Committee provides:

Implement timing restrictions during March 15 through July 15 to reduce the likelihood of active dens relocating due to disturbance:

- Permit no disturbance within 1,200 feet of active dens that could result in den relocation.
- Permit no loud disturbance activities (e.g., blasting, helicopter logging and overflights for Forest-Service activities, road construction) within ½ mile of active dens.
- If status of a den is uncertain, then assume it is active.

The Unit Cards for the project provide:

Design management activities to avoid abandonment of wolf dens. Maintain a 1,200-foot forested buffer, where available, around known active wolf dens. Road construction within the buffer is discouraged and alternative routes should be identified where feasible. No road construction is permitted within 600 feet of a den unless activity review indicates that local landform or other factors will alleviate potential adverse disturbance.

Draft EA Appendix A, Unit Cards, at 6-7. The Forest Service should adopt the prohibition on loud disturbance activities, including roadbuilding, within a half-mile of an active den and clarify that dens of unknown status will be considered active for the purpose of applying these standards.

### **LUD Considerations**

Much of the project area is located in a Scenic Viewshed LUD. Draft EA at Figure 2. Desired conditions in this LUD include that

forest visitors, recreationists, and others using identified popular travel routes and use areas will view a natural-appearing landscape. Forest Plan at 3-103. A variety of successional stages providing wildlife habitat occur, although late successional stages predominate. Recreation and tourism opportunities in a range of settings are available. In the areas managed for High or Moderate Scenic Integrity Objectives, timber yields will

generally be obtained through the use of small openings or uneven-aged systems. A yield of timber is produced, which contributes to Projected Timber Sale Quantity (PTSQ).

Tongass Land Management Plan (TLMP) at 3-104. The draft EA generally does not assess the alternatives in terms of their impacts on scenic integrity or desired conditions in this LUD. The final EA should incorporate this analysis and inform the final project decision, especially for any areas of high or moderate scenic objectives.

The remainder of project activities occur in a Modified Landscape LUD. Draft EA at Figure 2. Although that LUD is less protective of scenic integrity, it does include some areas of moderate Scenic Integrity Objectives and those areas may benefit from the same analysis described above. Also, this LUD seeks to “reduce clearcutting when other methods will meet land management objectives” and to achieve “a variety of successional stages [that] provide a range of wildlife habitat conditions.” TLMP at 3-111. Alternative 4 is thus consistent with the management direction described for the Modified Landscape LUD.

### **Conclusion**

In sum, we appreciate the clarification of the project purpose and need and development of alternatives better suited to achieving the restoration and resilience goals of the SASS. We urge you to select Alternative 4 because it provides the best habitat quality and connectivity while generating economically feasible timber. If you do not select Alternative 4 as described, then we encourage you to keep as many of its more wildlife-friendly components as possible, particularly the uneven-aged management approach to units adjacent to the Point Agassiz OGR.

Thank you for your consideration of these comments.

Sincerely,

/s/

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