



Southeast Alaska Conservation Council

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Quentin Hall, Project Lead

Attn: Thorne Bay Basin Integrated Resource Management Project

Thorne Bay Ranger District

P.O. Box 19001

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Submitted electronically via portal: <https://www.fs.usda.gov/project/?project=62854>

Based in Juneau, Alaska (Tlingit/Áak'w K̓wáan 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.

SEACC thanks the Forest Service for this opportunity to comment on the Thorne Bay Basin Integrated Management Project (TBB IRMP). We would also like to thank Mr. Quentin Hall, Project Manager, directly for his prompt and thorough responses to our questions during the scoping comment period. Attached to this communication are several PDF images that were made at our request, which greatly helped to inform us.

The Need for an Environmental Impact Statement (EIS)

The Forest Service is proposing a 26,000 acre young-growth timber sale that includes clearcutting second growth forests in "timber emphasis units," road-related activities including road building and reconstruction, and pre-commercial and commercial thinning in previously clearcut areas, described as "habitat emphasis units," over a fifteen year period.

The Forest Service should re-scope this project and provide several alternatives which log much less volume and provide more restoration and habitat improvement. As currently planned, more than two thousand acres will be clearcut. This is more than four times the size of the recent Thomas Bay Young Growth sale, which included in its Preferred Alternative (3) the use of two-aged management (logging method other than clearcut) for most units, resulting in gaps no bigger than 30 acres.¹ The Forest Service should include alternatives for the TBB IRMP which use other methods of harvest besides clearcutting, resulting in smaller gaps project-wide.

¹ USDA Forest Service, Alaska Region. April, 2023. *Thomas Bay Young Growth Timber Sale Environmental Assessment and Finding of No Significant Impact*. Petersburg, AK.
<https://www.fs.usda.gov/project/?project=60639>.



SEACC wants to emphasize the need for an Environmental Impact Statement (EIS) for the TBB IRMP. An EIS is required by the National Environmental Policy Act (NEPA) for any “major federal action significantly affecting [the] quality of the human environment.”² This requires two thresholds to be met. First, the action must be a “major federal action.” Second, this action must “significantly affect” the environment. Impacts to the project area and its resources, public health and safety, endangered species, short- and long-term effects, beneficial and adverse effects, and coherence with other laws are the criteria the 2020 NEPA regulations use to determine significance.³ In contrast, an EA is sufficient only when the “proposed action is not likely to have significant effects.”⁴ This project will undoubtedly have numerous significant effects on the environment in and around the project area. It also has the potential to significantly impact wildlife populations, some of which may be endemic to Prince of Wales and are already threatened by previous and continued logging on Prince of Wales Island.⁵ No information about one currently endangered species—the Queen Charlotte Goshawk—for the project area was provided in the scoping notice so it is not possible to determine its presence, or lack thereof, in the project area.

A. Major Federal Action

NEPA cites an agency’s “approval of specific projects...located in a defined geographic area” as one of four categories that major federal actions tend to fall into. Since the Forest Service, a federal agency, plans to approve the specific Thorne Bay Basin Integrated Management Project, that project is subject to federal control and responsibility and is likely a major federal action. A 26,000 acre project area, numerous management activities and objectives, and a fifteen year timeline certainly indicate a major Federal action.

B. Significant Environmental Effects and Cumulative Impact

² 42 U.S.C. § 4332(2)(C).

³ 40 C.F.R. § 1502 (b)(1–2) (current 2020 regulations):

(1) In considering the potentially affected environment, agencies should consider, as appropriate to the specific action, the affected area (national, regional, or local) and its resources, such as listed species and designated critical habitat under the Endangered Species Act. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend only upon the effects in the local area.

(2) In considering the degree of the effects, agencies should consider the following, as appropriate to the specific action:

Both short- and long-term effects.

Both beneficial and adverse effects.

⁴ 40 C.F.R. § 1501.5(a)

⁵ Hasbrouck, T. R. 2023. *Deer management report and plan, Game Management Unit 2: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026*. Alaska

Department of Fish and Game, Species Management Report and Plan

ADF&G/DWC/SMR&P-2023-16, Juneau; Dawson, N.G., MacDonald, S.O., and J.A. Cook. 2007. Endemic Mammals of the Alexander Archipelago. *Southeast Alaska Conservation Assessment*. Chapter 6.7.



Currently, the 2020 NEPA regulations decide significance based on impacts to the project area, its resources, public health and safety, endangered species, short- and long-term effects, beneficial and adverse effects, and coherence with other laws. There are active lawsuits challenging the 2020 regulations and no court has decided the issue yet. Both the 1978 and 2020 NEPA regulations mandate that a NEPA analysis must consider all effects a project may have on the environment, including direct, indirect, and cumulative effects.⁶ Based on cumulative impact alone, SEACC contends that an EIS is clearly the necessary NEPA mechanism. Prince of Wales (POW) has the highest road density in the region and has lost almost half of its original forest to logging.⁷ As a result, the population of Sitka Black-tailed deer, the island's only ungulate and a major source of subsistence food, is declining and expected to continue to do so.⁸ Subsistence hunters have expressed grave concern about this factor at recent public meetings, such as the 2022 Deer Summit, held on POW, which invited both Federal and State resource managers to the table and provided the public with information about the deer population decline—tied directly to logging and associated road-building impacts.⁹ This event was well-attended, providing more evidence that this issue is of great concern to the public, a qualifier for constructing an EIS per the 1978 NEPA guidelines. In the scoping document, the Forest Service acknowledges this issue and concern.¹⁰ Subsistence hunting is extremely important on Prince of Wales Island culturally, spiritually and economically, and all residents are considered subsistence users. Federal managers cannot ignore subsistence concerns when planning projects.

Road Construction and Old-Growth

While SEACC understands that there is no old-growth harvest associated with this particular project, this project appears to be setting up for that scenario by building new temporary road sections into and along the old-growth parcels in the project area. Islands of old-growth are surrounded by young-growth areas proposed for logging, such as Areas 5 and 6 on the attached map, along with two other un-numbered areas immediately to the north and northeast. These areas should be connected to other old-growth areas or beaches; most of them appear as if they will become isolated old-growth patches instead of adjoining to connective corridors of old-growth or older second growth.

Many old-growth stands within the project area lie directly adjacent to the Recreational River LUD or the Old Growth Reserve area on the far east side of the project. Approximately 3,600 acres of State lands

⁶ 40 C.F.R. § 1508.1(g)

⁷ Hasbrouck, T. R. 2023. *Deer management report and plan, Game Management Unit 2: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026*. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-16, Juneau.

⁸ *Id.* at pp. 3 & 4.

⁹ October 13-15, 2022. *Deer Summit, POW Unit 2*. Klawock, AK.

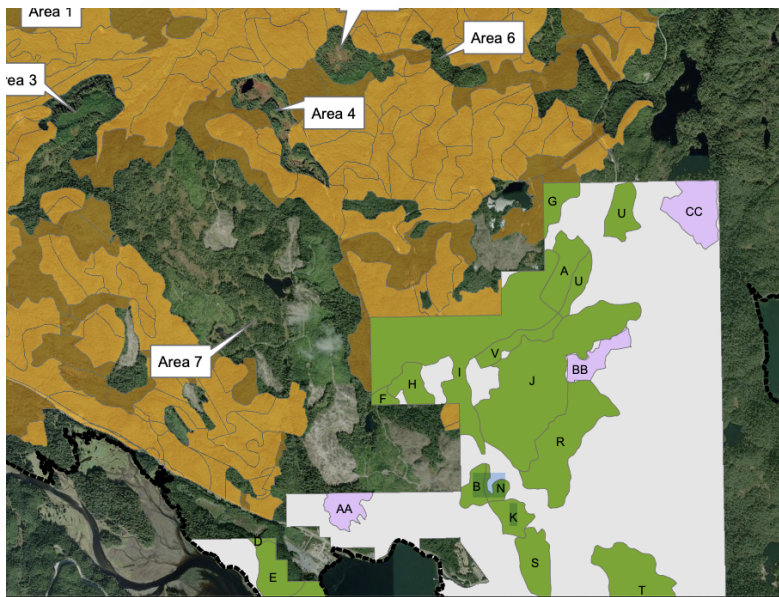
¹⁰ USDA Forest Service, Alaska Region. September, 2023. *TBB IRMP Scoping Notice* at 2.



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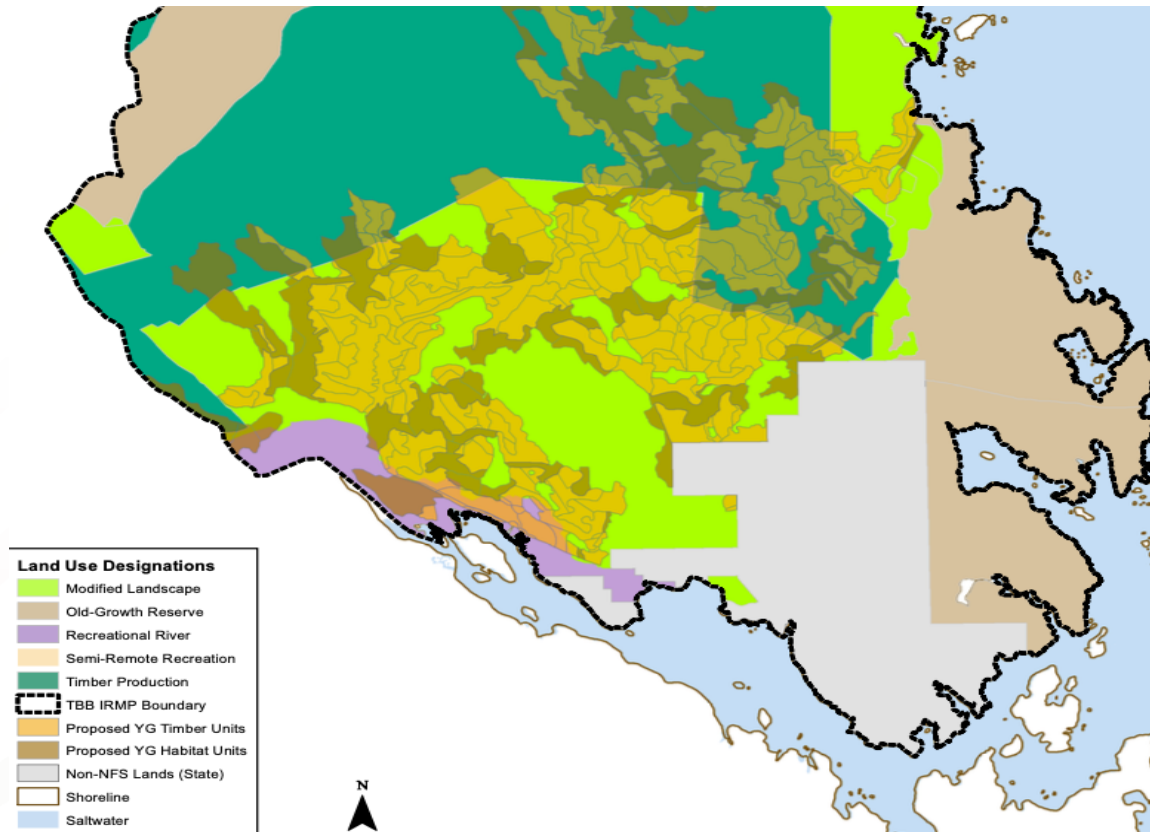
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adjacent to that area have been or will soon be logged, so the old-growth is isolated and the TBB IRMP further fragments or isolates much of the remaining connective habitat, which is either old-growth or older second growth with old-growth characteristics. None of these cumulative impacts has been identified or addressed within the scoping document. Every effort to leave as much timber and connective habitat adjacent to these areas as possible should be made, yet young-growth timber production units are defined along the western edge of State property; the Forest Service should retain a large habitat buffer between State and Federal land boundaries. The addition of the lands the Forest Service intends to log under this proposal to the already-logged State areas will create a large clearcut gap in the center of the project area, minimizing the benefit of some of the proposed habitat restoration units nearby.



For example, in Area 7, an area with numerous pockets of POG, there appears to be no connective habitat corridor to the north towards a large area of POG, and little connectivity left in the center of the project area (east of Area 7)--an area which looks like it will become, when combined with logged State lands, one large clearcut.

The following image shows Forest Service Land Use Designations (LUDs) and State land ownership more clearly within the project area. The Forest Service should remove units which are directly adjacent to State lands (such as the isolated unit toward the southeast corner of Area 7) from harvest and restrict management activity in those areas to habitat restoration or improvement.



Purpose and Need, Range of Alternatives

SEACC questions the description of this project, in part, as SASS-aligned wildlife habitat restoration or enhancement project. Without site-specific information about the types of wildlife, habitat, watershed conditions and second-growth in the project area, it is not possible to determine how managers believe this project will benefit wildlife. As it currently appears on maps, this project provides little or no benefit to deer or indicator species such as marten.¹¹ Minimal connections between elevations or old-growth areas appear to be maintained or provided, and others look as if they will be removed or degraded, all while increasing road density and disturbance in the area.

The Forest Service defines numerous Forest Plan elements that are supposedly met by this project; of particular concern:

¹¹ Kiester, A. Ross and C. Eckhardt. 1994. *Review of wildlife management and the conservation biology on the Tongass National Forest: A synthesis with recommendations*. Pacific Northwest Research Station, USDA Forest Service. Corvallis, OR.



- O-YG-01: During the 15 years after plan approval, the amount of young-growth offered would gradually increase to exceed 50 percent of the timber offered annually.
- O-YG-02: During the 15 years after plan approval, offer increasing annual volumes of economically viable young-growth timber. Old-growth timber harvest would gradually be reduced to an average of 5 million board feet (MMBF) annually, to support Southeast Alaska mills.¹²

These two objectives should be removed. The 2016 Tongass Forest Plan is currently being re-written. No significant logging projects should be approved until the new plan is complete. The Tongass has been directed to immediately stop managing for large-scale old-growth sales. SASS was the response to a clear directive by President Biden's administration to immediately reduce old-growth logging on the Tongass and the current five-year timber sale plan for the Tongass reflects this reality.¹³ These objectives are obsolete considering current guidance for Tongass National Forest management.

The Forest Service should provide a wider range of alternatives with more of the project area dedicated to wildlife habitat restoration or improvement, focusing on protecting habitat connectivity, old-growth and older second-growth adjacent to State land sections. The Forest Service should ensure that details of the restoration efforts are made clearer in terms of where these connective corridors are, and include additional data about deer populations and habitat in these areas. It is difficult to see habitat connectivity or corridors in the proposed project area, from our first interpretation of the additional images provided by the Forest Service.

Socioeconomic conditions have been inaccurately characterized in the scoping document. While it may be true that the Thorne Bay area "is positioned to become an economic hub for sustainable young growth harvest in the future,"¹⁴ this area is not currently equipped to process wood products locally. The Forest Service is putting the cart well before the horse. An annual average of 3-5 million board feet of timber was stated as coming from the timber emphasis units in the scoping notice. There are not currently enough small mills, or an existing facility equipped to process a fraction of the proposed project area timber volume on POW. That means it will be exported as raw logs, rather than as value-added wood products. The local young-growth market has not been developed to the degree that a large supply of timber would be utilized by small operators at this time.

¹² *Id.* at 4.

¹³ USDA Forest Service, Tongass National Forest. December, 2021. *5-Year Timber Sale Schedule 2022-2026*. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd977797.pdf.

¹⁴ USDA Forest Service, Region 10. *Thorne Bay Basin Integrated Management Project Rescoping 2023*, at 2. <https://www.fs.usda.gov/project/?project=62854>.



While SEACC was encouraged to see a longer timeline (15 years) for this project, and a phased approach, we question the validity of these claims based on previous timber sales that were supposed to provide a long-term timber supply over ten or more years. What assurances can the Forest Service offer that logging will take place in a measured, phased manner as indicated? That would be possible only if this timber is allocated exclusively to *small operators*. The six small mills that were active on POW in 2021 processed only 0.1 MMBF (million board feet) of second growth timber.¹⁵ Many of these mills specialize in cedar.¹⁶ Yellow cedar does not regenerate in second-growth stands and red cedar regenerates at a much lower level.¹⁷ By proposing a sale that will supposedly provide 3-5 MMBF per year, most of which will not be cedar, the Forest Service virtually guarantees that these trees will be exported in round logs. That disposal of timber does not meet sustainable, long-term economic goals for local and regional economies. SEACC cautiously supports a young-growth industry that provides timber to small sawmill operators over longer periods of time, where the timber is processed locally into value-added wood products and the profits stay within the region and the State. This project, as defined in scoping, does not meet thresholds for long-term economic sustainability and does not represent the type of project that the Tongass National Forest should be encouraging within the transition framework.

SEACC also has questions about how this sale will be executed. The Southeast Alaska Sustainability Strategy Forest Management (SASS FM) component states that one of the criteria for successful timber sales, Added Value, includes promotion of workforce development. The scoping notice for the TBB IRMP does not describe how the proposed project will accomplish this. In order for this project to align with SASS goals, specifics about how the local workforce will be developed and used to complete project work should be clearly defined and established *before* the project is approved. Currently, the POW workforce does not seem adequate to accomplish the thinning, restoration work and road work described. SASS FM criteria (Resources, Readiness, and Added Value) define “readiness” of young-growth timber lands as containing at least 20,500 merchantable board feet/acre.¹⁸ While the Forest Service claims that the timber emphasis units in the Proposed Action would be designed to provide 2-5 million board feet annually, SEACC did not see timber stand data in the scoping notice that would support this figure, a further reason to suggest preparation of an EIS that should provide these important details.

¹⁵ Daniel, J., P. Morris & D. O’Leary. 2022. *2021 Sawmill capacity and production report*. USDA Forest Service, Alaska Region. Report to Ecosystem Planning and Natural Resources. August 2022. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1056341.pdf

¹⁶ *Id.*

¹⁷ USDA Forest Service, Alaska Region. *Prince of Wales Landscape Level Analysis FEIS* at 108. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd601039.pdf.

¹⁸ USDA Forest Service, Tongass National Forest. March 2023. *Southeast Alaska Sustainability Strategy Forest Management Assessment Tool with Draft Criteria*. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1099238.pdf.



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The Forest Service needs to go back to the drawing board in crafting its purpose and range of alternatives for this project, given conflicting Forest Plan and SASS goals. Other alternatives which harvest less timber, build fewer roads and prioritize habitat restoration should be crafted and considered. An alternative focused solely on restoration should be provided.

Additional Questions and Concerns

SEACC has questions and concerns regarding specific areas within the project area. Of particular concern, we are not seeing connective habitat stands retained in areas where isolated islands of POG exist, in particular through the center of the proposed project area. We are not seeing connective stands of older young-growth timber retained along the Recreational River LUD corridor, something of great concern habitat-wise. SEACC also has concerns with the rationale for some of the new temporary roads we see proposed within the project area. Many are immediately adjacent to "Useable NFS Roads," according to a map provided by Forest Service project managers. We would like to discuss a few of these specific areas with project managers. On POW, new roads will only create more habitat fragmentation, increase the need for restoration, and should be a *very* limited element of any management activity within this heavily impacted landscape.

SEACC thanks the Forest Service for the opportunity to comment on this project.

Respectfully,

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