



*Delivered via email & online portal submission*

October 18, 2023

Francis Sherman  
Reviewing Officer  
Tongass National Forest  
Federal Building  
648 Mission Street  
Suite No. 110  
Ketchikan, AK 99901

Re: AFA Comments on the Thorne Bay Basin Integrated Resource Management Project #62854

Mr. Sherman,

The Alaska Forest Association (AFA) appreciates the opportunity to provide comments on the Thorne Bay Basin Integrated Resource Management Project (the project) in the following general categories and as further specified below:

Need Statement:

In general, the Need Statement explains current conditions in and outside of the project area. It also explains how the Proposed Action would contribute to many Forest-wide goals, objectives, and desired conditions identified in the Forest Plan.

The Need Statement does not provide the needed rationale for all the proposed actions. The only need listed within the Need Statement is that;

"Both the OneUSDA Southeast Alaska Sustainability Strategy (SASS) and the public have challenged the Forest Service to identify short- and long-term opportunities for investments that reflect the diverse opportunities and needs in the region, including but not limited to developing new economic opportunities like young growth harvest. A consistent flow of raw material from POW's young growth forests is needed to successfully build the infrastructure investments necessary to shift local industry away from dependence on old growth harvest." (pg. 2) (emphasis added).

The NEPA document for the project must explain how the proposed project develops new economic opportunities, provides a consistent flow of raw material needed for successful infrastructure investments and shifts the local industry away from old growth harvest. In other words, the timber sales from the project must provide raw material that is positive in economic value when manufactured locally.

AFA suggests that the Need Statement be revised for not only this project, but future projects in the Tongass as follows:

There is a need to:

- Ensure that ecosystems within the development land base of the Tongass National Forest provide sufficient usable habitat for the flora and fauna of the forest.
- Construct new infrastructure while maintaining and improving existing infrastructure to provide access to the Tongass National Forest for all users.
- Provide sufficient positive value timber sales of various sizes (100MBF – 10MMBF) so family-owned businesses working in the forest products sector survive the abrupt change to an integrated YG based forest management program and succeed afterwards.
- Provide an infinite number of opportunities for residents of the Tongass National Forest to flourish while residing within the forest.

The Purpose of the project is:

“The purpose of the TBB IRMP is to contribute to the economic and ecological health of Southeast Alaska’s communities by protecting and restoring watershed conditions, improving terrestrial habitat conditions and connectivity, and providing a supply of young-growth timber to help transition to a more sustainable economy that is not dependent on large-scale old growth harvest.” (pg. 3)

“The Forest Service proposes this project to improve wildlife habitat, provide commercial young-growth harvest opportunities, and implement riparian and road restoration activities in the project area, as well as to provide support for employment and economic growth. The activities are designed to support healthy forests, bring economic benefits to local communities, enhance fish and wildlife habitat, and support cultural, traditional and subsistence uses in the area.” (pg. 5)

The NEPA document for the project must show how the project contributes to **the economic and ecological health** of the communities of Southeast Alaska. When addressing YG timber harvest within the project it must show a positive value return from harvest that will produce a sustainable economy or prove that a negative value economy is sustainable. It must also show how the projects within the document support employment and economic growth.

#### Forest Plan Requirements

The request for comments document contains several statements about the need to maintain the abundance of habitats and maintain their ability to produce wildlife populations such as:

“Maintain the abundance and distribution of habitats, especially old-growth forests, to sustain viable populations in the planning area.” (pg. 2)

“Maintain habitat capability sufficient to produce wildlife populations that support the use of wildlife resources for sport, subsistence, and recreational activities, including a young-growth management program to maintain, prolong, and/or improve understory forage production, and to improve habitat distribution, including future old-growth characteristics in young-growth timber stands for wildlife on lands both suitable and not suitable for timber production.” (pg. 2)

Did the project(s) that produced these existing conditions violate the Forest Plan in effect at the time of implementation? Is the Conservation Strategy within the current Forest Plan inadequate?

Other General Comment Re: NEPA Document:

The NEPA document for this project must show in detail how it will meet the following goals in Chapter 5 of the current Forest Plan:

“GL-YG-04: Harvest of young-growth timber supports a variety of mill sizes and operators across the forest, including small and micro sales that support economic opportunities.” (pg. 4)

“GL-YG-05: Make available a variety of potential forest products that support the development of an integrated industry based primarily upon young-growth timber harvest.” (pg. 5)

The NEPA document must also show how it will meet the needs of various size mill operations with the proposed offerings of 2-5 mmbf annually. How does that volume of timber maintain a mill operation that uses more than 5 mmbf annually? How does this project produce an integrated industry with such low annual volume offerings? For example, the pellet plant that SE Conference plans to construct needs approximately 2.5 – 3.0 mmbf annually.

Within the 2016 Forest Plan, both Modified Landscape and Timber Production LUDs contain the following Objective: Emphasize the overall reduction of costs, increase revenue, and improvement of public service within the timber program. The NEPA document must show how this project will reduce costs and increase revenue from the timber program proposed by the document. To do such the NEPA document must analyze multiple alternatives including at a minimum an economic alternative as well as the proposed action and no action alternatives.

Finally, the US Forest Service (USFS) should consider adopting an approach in NEPA documents that ensures clearing a larger amount of NEPA volume. The USFS does not need to sell all the volume that is cleared, but no volume can be sold if there is none cleared. This is critical as the Tongass has only 1-1.5 IDTs and there is an intense focus on working towards the new Forest Plan. Historically, timber offerings have faltered during times when workloads and staff tasks are shifted to Forest Plan activities.

Thank you for the opportunity to comment. I can be reached at either [tessa@akforest.org](mailto:tessa@akforest.org), or 907-225-6114.

Regards,

A handwritten signature in black ink, consisting of a long horizontal stroke with a small loop at the end and a vertical stroke crossing it near the beginning.

Tessa Axelson  
Executive Director