Southeast Alaska
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SEACC Objection to the Thorne Bay Basin Integrated Resource Management Project (TBB IRMP)

Executive Summary

The Southeast Alaska Conservation Council (SEACC) submits this objection to the Thorne Bay Basin Integrated Resource Management Project with appreciation for recent improvements made during the scoping and rescoping phases. We commend the Forest Service for eliminating old-growth harvest, prioritizing habitat emphasis in select units, and reducing road construction. However, we remain concerned about the reliance on clearcutting (even-aged management), potential negative impacts to subsistence resources, insufficient exploration of alternatives beyond the No Action scenario, lack of analysis of log transfer facility effects, and the lack of a full Environmental Impact Statement despite acknowledging that previous submissions of public comment called for one.

This objection is submitted pursuant to 36 CFR § 218 and builds upon our previous comments submitted on October 18, 2023. We urge the Forest Service to complete a full Environmental Impact Statement, consider a broader range of alternative actions, increase specific plans to support micro-sales and local mills, and address cumulative habitat impacts more rigorously. We also recommend elevating protection for subsistence access and ensuring that habitat connectivity, hydrologic function, and biodiversity resilience remain central to project implementation.

I. Introduction

SEACC is a grassroots organization based in Juneau, representing more than 7,000 supporters across Southeast Alaska. Our mission is to protect the region's natural resources and promote sustainable forest management that aligns with community well-being, subsistence traditions, and ecological resilience. SEACC submits this objection pursuant to 36 CFR Subparts A and B, drawing from review of the Thorne Bay Basin Integrated Resource Management Plan Environmental Assessment, prior comment,

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supporting documentation, and relevant ecological research pertaining to the Tongass National Forest[1].

The Thorne Bay Basin Integrated Resource Management Project encompasses a substantial area of approximately 29,923 acres, including 26,326 acres of National Forest System (NFS) land and 3,596 acres of non-NFS land around Thorne Bay on Prince of Wales Island. Notably, young-growth forest originating from past clearcut harvest occupies about 11,482 acres—or 44 percent—of the NFS lands in the project area, underscoring the area's history of industrial disturbance. Over the 15-year implementation period, the project would allow for approximately 2,299 acres of young-growth timber harvest, yielding an estimated 47.4 million board feet of timber—effectively continuing a history of extractive disturbance across impacted forest landscapes. In addition, the project proposes to implement habitat treatments—including thinning, canopy gaps, and riparian thinning—on 2,884 acres, and conduct road-related activities involving about 60 miles of road maintenance or reconditioning, 11 miles of temporary road reconstruction, and 10 miles of new temporary road construction, as well as 0.11 miles of new National Forest System road construction. While SEACC applauds the incorporation of habitat restoration aspects, these do not nullify the impacts from the Proposed Action. Given the project's extensive scale, significant environmental impacts, and the area's history of disturbance, an Environmental Impact Statement is warranted to ensure comprehensive evaluation and public transparency, in accordance with the National Environmental Policy Act (NEPA) requirements.

II. Regional Context

Prince of Wales Island is the fourth-largest island in the United States[2] and stands as a hotspot of endemism, biodiversity, and ecological vulnerability in the Tongass National Forest. The island hosts several endemic species, including the Prince of Wales flying squirrel (*Glaucomys sabrinus griseifrons*), an endemic ermine (*Mustela erminea celenda*), and a distinct subspecies of spruce grouse (*Falcipennis canadensis isleibi*), all of which are tightly coupled to old-growth forest ecosystems. The Queen Charlotte goshawk (*Accipiter gentilis laingi*) and Alexander Archipelago wolf (*Canis lupus ligoni*)—two species with elevated conservation concern—also depend heavily on intact forest structure and prey availability supported by the region's ecological complexity[3].

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[1] 36 C.F.R. § 218 (Department of Agriculture, n.d.).
[2] WorldAtlas. "10 Largest US Islands." Last modified December 2024. https://www.worldatlas.com/islands/10-largest-us-islands.html.
[3] Smith, Melanie A., ed. 2016. *Ecological Atlas of Southeast Alaska*. Anchorage, AK: Audubon Alaska.

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Furthermore, studies show that subsistence use areas on Prince of Wales Island are among the most sensitive to disturbance across the region. Indigenous communities, including the Kaigani Haida and Tlingit, have stewarded this landscape for millennia. Today, the harvest of deer, salmon, halibut, and forest vegetation continues to provide food security and cultural continuity for rural residents. The average annual subsistence harvest in Southeast Alaska is estimated at 275 pounds per person, with deer making up nearly a quarter of household subsistence biomass[4].

These data illustrate that ecological, cultural, and food system integrity on Prince of Wales remain fundamentally intertwined. Project activities must therefore be designed with utmost care to preserve these values.

III. Status of Forests and Biodiversity

North Prince of Wales ranks highest for ecological value among all Southeast Alaska provinces. It supports the greatest extent of productive forest land and historically provided the highest-quality winter habitat for Sitka black-tailed deer and nesting habitat for marbled murrelets. However, this area has endured over four times the logging impact of any other province in the region, with 94% of landscape-scale high-volume forest already removed. This cumulative loss underscores the importance of remaining connectivity corridors, second-growth recovery planning, and limitations on further disturbance—especially in watersheds critical for subsistence and wildlife[5].

Second-growth stands on Prince of Wales remain largely in the stem exclusion stage, with limited understory vegetation and declining habitat value for deer. Watersheds such as Deer Creek and Slide Creek exhibit impaired function due to high road densities. Key wildlife—including deer, marten, and salmon—require structural diversity and connectivity across forest age classes. Ongoing fragmentation places these ecosystems at risk, particularly given climate variability and increased development on adjacent State and Native lands.

IV. Threats to Forests and Biodiversity

The Finding of No Significant Impact acknowledges the long ecological timeframes required for forest structure and function to recover following harvest. According to the EA, the stand initiation phase generally extends to 25 years post-harvest, followed by the

[4] Fall, James A., and Marylynne L. Kostick. *Food Security and Wild Resource Harvests in Alaska*. Technical Paper No. 457. Alaska Department of Fish and Game, Division of Subsistence, July 2018.
[5] Smith, Ecological Atlas of Southeast Alaska.

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stem exclusion stage, which may persist up to 150 years. Only after this period do forest stands begin entering the understory reinitiation stage, and it may take 300 to 500 years to develop the complex vertical and horizontal structure of productive old growth[6]. Productive old-growth forest is defined by large trees of varying age, diverse understory, snags, downed logs, and multilayered canopy gaps—features critical to wildlife habitat connectivity and biodiversity[7].

While the Proposed Action includes habitat restoration treatments such as precommercial thinning, these are largely framed as supplemental rather than foundational to the project. The specific use of clearcutting, which resets successional development, is intrinsically at odds with the Forest Service's recognition of the centuries-long trajectory necessary to recover late-successional forest functions. Short-term silvicultural interventions cannot substitute for structural complexity that develops over centuries, and continued use of even-aged regeneration strategies risks compounding fragmentation and deferring habitat value across the landscape.

- Even-aged management (clearcutting) reduces vertical and horizontal habitat structure, delays the development of late-successional traits, and diminishes critical forage for deer, with studies showing that such practices in young-growth stands offer little ecological benefit to wildlife[8].
- High road densities impair watershed health and increase sedimentation, negatively impacting fish habitat and compounding flood risks.
- Loss of habitat connectivity—particularly adjacent to logged State lands—fragments key corridors, isolates old-growth patches, and undermines species movement.
- Timber export pressures risk marginalizing local mills and reducing the ecological and economic value retained within Southeast Alaska.

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[6] Alaback, Paul B. 1984. *Secondary Succession Following Logging in the Sitka Spruce-Western Hemlock Forests of Southeast Alaska: Implications for Wildlife Management*. General Technical Report PNW-173. Portland, OR: USDA Forest Service, Pacific Northwest Forest and Range Experiment Station.
[7] USDA Forest Service. 2008c. *Tongass National Forest Land and Resource Management Plan, Final Environmental Impact Statement*. R10-MB-603c. USDA Forest Service, Alaska Region, Juneau.
[8] Hanley, Thomas A., et al. "Dynamics of deer habitat in the Tongass National Forest: vegetation succession, forest thinning, and natural disturbance." General Technical Report PNW-GTR-766, U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, 2013. https://www.fs.usda.gov/treesearch/pubs/43458

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V. Legal Framework Affecting Conservation Status

Under the National Environmental Policy Act, federal agencies are mandated to prepare a detailed Environmental Impact Statement for any major federal action significantly affecting the quality of the human environment. Specifically, NEPA Section 102(2)(C), as amended by the Fiscal Responsibility Act of 2023 (Public Law 118-5, enacted June 3, 2023) requires that agencies include in every recommendation or report on proposals for legislation and other major federal actions a detailed statement on:

- the reasonably foreseeable environmental effects of the proposed agency action;
- a reasonable range of alternatives to the proposed agency action that are technically and economically feasible, and meet the purpose and need of the proposal, including an analysis of any negative environmental impacts of not implementing the proposed agency action;
- the reasonably foreseeable adverse environmental effects which cannot be avoided should the proposal be implemented; and
- a summary of the agencies' consultation and coordination with any agency or entity that has jurisdiction by law or special expertise with respect to any environmental impact involved, including any such agency or entity with respect to compliance with applicable environmental laws (including the Endangered Species Act of 1973 and the National Historic Preservation Act).[9]

Furthermore, 40 C.F.R. § 1501.5(a) stipulates that an environmental assessment is appropriate only when a proposed action is not likely to have significant effects or when the significance of the effects is unknown[10]. Given the scale and potential environmental impacts of the Thorne Bay Basin Integrated Management Project, including thousands of acres of extensive logging, road construction, and effects on wildlife habitats, it is evident that the project meets the threshold for significant environmental effects. The cumulative impact of this management plan needs to be assessed in full. Therefore, in accordance with NEPA and its implementing regulations, the preparation of a comprehensive EIS is not only appropriate but necessary to ensure thorough environmental review and public involvement.

VI. Actions Necessary to Maintain Ecological Function

Consideration of ecological function for multiple use is the primary underpinning of SEACC's objection to the Thorne Bay Basin Integrated Resource Management Project. The

[9]U.S. Congress. Fiscal Responsibility Act of 2023, Public Law 118-5, 118th Cong., June 3, 2023.
[10] 40 C.F.R. § 1501.5 - Environmental assessments

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project's extensive scope—including approximately 2,299 acres of young-growth timber harvest, yielding an estimated 47.4 million board feet, and significant road-related activities—poses substantial risks to the ecological integrity of the area. These activities threaten to disrupt habitat connectivity, water quality, and the overall health of forest ecosystems, which are vital for supporting diverse uses such as subsistence hunting, recreation, and biodiversity conservation. Given these potential impacts, an Environmental Impact Statement (EIS) is warranted to ensure comprehensive evaluation and public transparency, in accordance with the National Environmental Policy Act requirements.

To support ecological resilience and long-term forest productivity, the following actions are necessary:

- Promote variable-density thinning and gap-based harvests over clearcutting.
- Maintain or enhance riparian buffers and elevational habitat corridors.
- Prioritize treatments that accelerate structural diversity and understory regeneration.
- Implement restoration activities in tandem with harvest to reduce hydrologic and habitat fragmentation.
- Expand protection of connectivity zones in areas with adjacent non-federal harvest.

VII. Extent to Which the Proposed Action Addresses These Needs

While the proposed action includes positive shifts—such as increasing habitat emphasis units and reducing road miles—it still leans heavily on clearcutting (1,649 acres of 2,299 proposed harvest). This contradicts best available science, which favors uneven-aged and retention-based systems. Although restoration elements have been included, many are framed as offsets rather than embedded principles of project design. The proposal also lacks adequate consideration for the impacts to key subsistence species and the broader cultural landscape.

While the Finding of No Significant Impact document notes the response to public comments, it maintains no Environmental Impact Statement without giving consistent, substantial, evidence-based reasoning to justify that finding.

Additionally, the Proposed Action relies on permits and Best Management Practices to govern the use of log transfer facilities, but it fails to analyze or disclose the potential impacts of bark debris accumulation on nearshore marine organisms. Log transfer and storage facilities are well-documented sources of marine habitat degradation. Bark and wood debris accumulate on the seafloor, smothering benthic communities, altering substrate composition, and reducing oxygen availability. These changes can inhibit

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recolonization by critical invertebrates and fish larvae, fundamentally altering trophic dynamics in shallow estuarine habitats.[11] Further, acidification from decomposing organic debris can reduce pH, alter microbial communities, and compromise shell formation in crab and mollusk populations.[12]

Bark deposits from log handling and storage in marine environments can have significant ecological effects. Studies have shown that bark deposits with high oxygen demand were observed at all active and abandoned log dumping sites. These deposits can lead to drastic depletion of benthic organisms in some areas. Bark deposits creating hypoxic conditions could lead to long-term changes in sediment composition[13].

Wood waste in aquatic environments can physically, chemically, and biologically impact the ecosystem. Even small amounts of wood waste (20% by volume) can negatively affect benthic communities. These impacts can persist due to decreased dissolved oxygen, decomposition by-products, and physical obstruction of native substrates.

VIII. Subsistence Access and Use

The Forest Service must recognize subsistence as a significant use of the landscape. Sitka black-tailed deer populations are declining, and hunters on Prince of Wales report increasing difficulty in meeting needs. Logging activities that reduce canopy cover, fragment habitat, or increase predator access along roads further stress the resource. Additionally, increased road construction can paradoxically erode traditional access by disrupting migration corridors and flooding low-lying trails. We urge greater use of Traditional Ecological Knowledge (TEK) and incorporation of cultural use areas into layout design.

IX. Recommendations

The table below provides a summary of key concerns raised during the public comment period and the extent to which those concerns were meaningfully addressed in the Environmental Assessment (EA) and rescoped project plan. While some modifications were made—particularly around road mileage and habitat connectivity—most of the

[11] Sedell, J. R., Triska, F. J., & Hall, J. D. (1975). The Forest Ecosystem of Southeast Alaska 3. Fish Habitats. USDA Forest Service General Technical Report PNW-15.
[12] Germano, J. D., & Browning, D. G. (2006). Marine Log Transfer Facilities and Wood Waste: When Dredging Is Not Your Final Answer. Proceedings of the Western Dredging Association Twenty-Sixth Technical Conference.
[13] Jessen, G. L., Lichtschlag, A., Struck, U., & Boetius, A. (2017). Hypoxia causes preservation of labile organic matter and changes seafloor microbial community composition (Black Sea). Science Advances, 3(2), e1601897.

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substantive issues related to ecological integrity, socioeconomic development, and procedural rigor remain either partially addressed or unaddressed. This underscores the need for further revision and a more holistic planning process moving forward.

Table 1. Extent to Which Comments Were Addressed

Original Concern	Extent Addressed in EA
Deer habitat fragmentation, loss of connectivity, and thinning efficacy	Partially addressed – Wildlife habitat connectivity areas were added, some units were changed to habitat emphasis, and thinning was justified broadly, but no direct response to literature on thinning effectiveness after 35 years.
Road building concerns, road density, and request for reduced-roads alternative	Partially addressed – The Forest Service reduced road mileage from the original scoping and considered a reduced-roads alternative, but did not fully analyze or carry it forward. No specific WAAs or cumulative road density maps were provided.
Old-growth patch isolation and lack of connective corridors between old and second-growth stands	Partially addressed – EA claims to protect elevational and lateral connectivity and avoid further fragmentation but does not directly respond to mapped concerns provided during scoping.
Workforce development, value-added processing, and support for local timber economy	Minimally addressed – EA mentions workforce development and possible biomass opportunities, but no specific actions or commitments to local hiring, tribal contracts, or processing infrastructure were outlined.
Request for Environmental Impact Statement (EIS) due to project scale and cumulative impacts	Not addressed – The Forest Service proceeded with an Environmental Assessment (EA) and issued a Finding of No Significant Impact (FONSI), asserting that the project does not trigger NEPA thresholds requiring an EIS.

This table summarizes public concerns raised during the project scoping phase and the extent to which those concerns were incorporated into the final Environmental Assessment for the Thorne Bay Basin Integrated Resource Management Project.

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Overall, while the EA demonstrates some responsiveness—especially regarding wildlife connectivity and reduction of new road mileage—many central concerns were only lightly acknowledged or not substantively addressed.

For example, habitat fragmentation and the effectiveness of thinning treatments were discussed, but no clear engagement with the cited literature or mapped connectivity concerns was evident. The EA also sidestepped detailed analysis of road density impacts and omitted cumulative habitat loss modeling.

Socioeconomic elements, including local employment and value-added timber processing, received minimal attention. While workforce development was mentioned, no clear commitments or frameworks were laid out to ensure community-scale benefits or alignment with sustainable forest transition goals.

Lastly, the EA process proceeded without preparing an Environmental Impact Statement, despite the project's large scope, extensive timelines, and cumulative environmental risks. These omissions suggest that while public feedback was considered, it did not significantly reshape the final project design.

In order to address the issues brought up in this objection and to bring the Thorne Bay Basin Integrated Resource Management Project into better alignment with federal policy, Forest Plan direction, and ecological best practices, the Forest Service should consider implementing the following recommendations. These recommendations are grounded in the concerns raised throughout the scoping and comment process and reflect a desire for more balanced, sustainable, and community-focused forest management.

This project has the potential to set a precedent as the first large-scale young-growth initiative under the Southeast Alaska Sustainability Strategy. To ensure that it genuinely reflects the goals of restoration, local benefit, and sustainable forestry, the Forest Service must move beyond the minimum procedural thresholds and adopt a more comprehensive and transparent approach to decision-making. The remedies to resolve SEACC's objection are as follows:

1. Prepare a full Environmental Impact Statement to address cumulative impacts and align with NEPA requirements.
2. Reduce reliance on even-aged management; increase use of two-aged and uneven-aged methods.
3. Expand habitat emphasis units and identify corridors for no-harvest conservation.

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4. Incorporate additional alternatives beyond the Proposed Action and No Action Alternative—including one focused on ecological thinning and reduced road footprint.
5. Strengthen subsistence protections with larger buffers and seasonal restrictions.
6. Increase and formalize micro-sales targeting local operators.
7. Evaluate local mill capacity more rigorously and integrate local processing commitments into contract conditions.
8. Disclose anticipated export volumes and set targets for domestic processing.
9. Enhance monitoring commitments and require annual reporting on restoration and habitat outcomes.

X. Conclusion

SEACC's position holds that the Finding of No Significant Impact associated with the Thorne Bay Basin Integrated Resource Management Plan is inadequate. The Environmental Assessment fails to adequately address cumulative effects, particularly regarding how proposed clearcutting would impair ecological function and access for both human subsistence use and wildlife distribution. These omissions are especially egregious in the context of adjacent lands with a patchwork of ownership and management schema, where compounded impacts on connectivity and resource availability are likely to occur.

We support the intent to provide timber volume accessible to a variety of mill sizes, including micro and small sales to local operators, as a way to encourage local economic opportunities. However, we believe that the current analysis requires a more robust assessment of the bidding structure, and a more clearly delineated micro- or small-business set-aside mechanism. Without such provisions, there is substantial risk that larger commercial interests will dominate sales through predatory bidding practices, undermining the goal of economic diversification within the region.

SEACC commends the Forest Service for its steps toward a more sustainable forest management model on the Tongass. However, to ensure ecological integrity, community benefit, and compliance with federal standards, further changes are needed. We urge the adoption of a full EIS, the consideration of a broader range of alternatives, and the implementation of management strategies that maintain the ecological function and subsistence value of the forest.

We look forward to continued dialogue and stand ready to support improved outcomes for the forests and people of Prince of Wales Island.

Thank you for your consideration of these comments,

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