



Legacy Forest Defense Coalition

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**OBJECTION to the South Revilla Integrated Resource Project #53577 -
Tongass National Forest**

Monique Nelson, Forest Supervisor, Ketchikan Misty Fjords Ranger District

Please accept this letter as the Legacy Forest Defense Coalition's formal objection to the referenced project.

South Revilla Integrated Resource Project (SRIRP)

I. Introduction

The Legacy Forest Defense Coalition (LFDC) is a coalition of forest ecology experts, public lands advocates, and engaged citizens working to protect forest ecosystems, strengthen climate resilience, and improve forest structure throughout Alaska and the broader Pacific Northwest. Our members represent a wide spectrum of public land users directly impacted by the activities of the U.S. Forest Service (USFS)—including hikers, hunters, anglers, naturalists, photographers, climbers, and birders—many of whom have a deep, multi-generational relationship with the lands at stake. Collectively, we share a longstanding commitment to ensuring that forest management prioritizes ecological integrity, cultural heritage, and public accountability over short-term industrial extraction. Recognizing the irreplaceable ecological and cultural value of mature and old-growth forests, we advocate for policies that enhance forest complexity, resilience, and long-term sustainability.

The South Revilla Integrated Resource Project (SRIRP) presents a direct threat to these objectives. As proposed, the SRIRP fails to adequately account for the severe ecological, economic, and cultural harms that would result from renewed old-growth logging in the Tongass.

The project undermines public trust by disregarding the interests of those most affected—residents, Tribes, and small business owners whose livelihoods depend on healthy forests and functioning ecosystems.

Please accept this letter as the Legacy Forest Defense Coalition’s formal objection to the referenced project.

II. Forest degradation is an urgent threat to the economy of Ketchikan

As one of the busiest cruise ports on the Inside Passage, Ketchikan receives hundreds of ship calls each summer, bringing well over 1.5 million passenger visits in recent years (**according to data from 2024 and 2025**) and making tourism a primary driver of local business revenue¹. Visitor spending on shore excursions, fishing charters (including sport fishing for king-salmon in Carroll Inlet), cultural tours, shops, restaurants, and transportation injects tens of millions of dollars into the community and supports a dense ecosystem of small, often locally owned businesses². Throughout Southeast Alaska, the tourism industry is by far the largest non-government sector by employment, outnumbering timber industry jobs more than 20:1 **according to data from calendar years 2022-2024²**.

In addition to the tourism industry, **analysis of data from 2022-2023** show the region’s economy is highly reliant on commercial seafood as the largest source of employment related earnings, more than \$300,000,000 compared to less than \$20,000,000 in wages generated by the timber industry². Projects like the SRIRP are an immediate threat to the 2 leading economic drivers in the regions—tourism and commercial seafood. What tourist wants to disembark a ship and look around to see massive scars left by commercial clear-cut logging? What local fishing owner wants to see further removal of high quality salmon spawning habitat vital to supporting economically important fish species? This project represents a direct threat to Alaskans, to the economic and social well being of all residents of Southeast Alaska—residents the USFS is meant to serve.

ALTERNATIVE:

Remove from the project, all mature and old-growth forest stands with the understanding that commercial timber operations are directly harming the residents of Alaska and beyond. Instead focus only on aspects of the project that improve landscape conditions by returning the forests to intact ecosystems and increasing recreation opportunities.

[1]<https://www.wrangellsentinel.com/stories/more-cruise-ships-add-ketchikan-stops-total-could-exceed-16-million-passengers,51917>

[2]<https://www.kcaw.org/wp-content/uploads/2023/09/SE-by-the-numbers-2023-Final.pdf?x75531>

II. Logging in Tongass is harming taxpayers – more than \$600 million dollars in the last 2 decades and rising

The industry's parasitic relationship with taxpayer owned natural resources is well documented. Taxpayers for Common Sense has documented that the Forest Service's Tongass timber program has lost hundreds of millions of dollars over recent decades, with timber sale revenues covering only a small fraction of the costs to plan, administer, and road these sales. Their analysis of Forest Service budget data found that between 1999 and 2018, the agency spent about \$632 million on Tongass timber sales while collecting only \$33.8 million in receipts—a net loss of roughly \$598 million, or just 5.4 percent cost recovery³. Looking over a longer timeframe back to 1980, they estimate that Tongass timber sales have generated approximately \$227 million in revenue but cost about \$1.96 billion to administer, resulting in more than \$1.7 billion in losses for federal taxpayers.

How many more years of data does the Forest Service need to finally realize that logging in Southeast Alaska is a waste of taxpayers money? **In 2025** the President of the Organized Village of Kake, Joel Jackson, when asked about recent timber sales in Tongass NF stated “Nobody touched it [in reference to a recent timber sale], the reason why they didn't touch it was because it costs so much to get the timber to the water in and out. Truck it to the water, put it in rafts, and tow it away. And same with Kuiu Island, which is just next to us out here, there were numerous timber sales out there. Same situation there, nobody bid on it because they took all the easy timber.”⁴

ALTERNATIVE:

Abandon this and all future timber projects that include mature and old-growth forest and develop projects that put tax money back into the community by improving landscape integrity thereby supporting economic sectors that can be done in an ecologically responsible way and can be sustainable over time; like seafood and tourism.

IV. Continued logging of old-growth timber in Tongass risks the elimination of Alaskan Native Tribal Heritage

Referring to the 500-600 year old cedar trees threatened by logging in Tongass, the President of the Organized Village of Kake, Joel Jackson states “It takes that long to grow them,” Hamar said. “But it takes only a fifth of that time to level off thousands of them. The reality is we won't be able to replace those within our lifetime. Our totem poles are getting smaller. Canoes aren't being carved hardly at all. We're right on the cusp of losing all that kind of stuff anyway. If we allow a culture of extraction to replace entirely our Indigenous cultures and the way that we steward and respect our surroundings, then we're really allowing totem poles culture and canoe culture and all these sorts of things, we're allowing that to disappear⁴

[3]<https://www.taxpayer.net/energy-natural-resources/new-report-taxpayers-losing-hundreds-of-millions-of-dollars-on-tongass-timber-sales-over-last-two-decades-2/>

ALTERNATIVE:

Remove all stands that have not been previously harvested and limited implementation areas to stands harvested in the last 80 years with an explicit restriction that states not trees over 80 years old will be harvested. AND consult or re-consult with the 3 major Native Alaskan Tribes in the affected region—representing the Tlingit, Haida, and Tsimshian people—to ensure the project is restructured to ensure the continuation of their people and heritage.

VIII. Conclusion

The Legacy Forest Defense Coalition urges the U.S. Forest Service to recognize that continued old-growth logging in the Tongass National Forest undermines ecological integrity, cultural heritage, fiscal responsibility, and the economic health of Southeast Alaska's communities. The South Revilla Integrated Resource Project, as proposed, perpetuates outdated management practices that cause far more harm than benefit to the public the agency is meant to serve. Genuine stewardship requires a shift toward projects that restore ecosystems, respect Tribal sovereignty, and sustain the natural and economic legacy of Alaska's forest landscapes.

To meet the intent of this objection, the Forest Service must implement the following changes:

- Remove all mature and old-growth forest stands from the South Revilla Integrated Resource Project.
- Limit project activities to restoration and recreation improvements that enhance forest integrity and public access.
- Abandon current and future timber projects that include mature and old-growth harvest, and reinvest in sustainable local economies such as tourism and fisheries.
- Conduct full consultation or re-consultation with the Tlingit, Haida, and Tsimshian Tribes to ensure cultural continuity and genuine Tribal participation in project design.
- Commit to transparent public engagement and account for the full environmental, cultural, and economic costs of proposed timber activities.

Thank you for your consideration of this objection and for taking these necessary steps to protect the health, heritage, and sustainability of Alaska's forests and communities.

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