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Janelle Crocker, Acting Forest Supervisor
Tongass National Forest
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Submitted Via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=301827>

Re: Trout Unlimited Comments on Twin Mountain II DEIS (#301827)

Dear Acting Forest Supervisor Crocker,

Please accept these comments on behalf of Trout Unlimited (TU) on the Twin Mountain II Timber Sale Draft Environmental Impact Statement (DEIS).

Trout Unlimited is the nation's largest sporting organization dedicated to coldwater conservation, with more than 300,000 supporters nationwide and more than 20,000 supporters in Alaska—including anglers, lodge and outfitting business owners, guides, subsistence harvesters, and commercial fishermen. In addition to our 15 Alaska-based staff and our members in more remote parts of the state, TU has active chapters in Juneau, on the Kenai Peninsula, in Anchorage and the Mat-Su Valley, and in Fairbanks.

TU members and supporters rely on the fish, wildlife, and water resources of the Tongass—including Prince of Wales Island—for fishing, hunting, subsistence, outdoor recreation, and employment in the fishing and tourism industries. TU is committed, through the investment of significant staff and financial resources, to conserving and restoring the fisheries and watersheds of the Tongass, and to ensuring the region's wild salmon resources continue to serve as the economic and cultural foundation of Southeast Alaska.

Trout Unlimited has a long history of working collaboratively with the Forest Service on the Tongass. We maintain a long-standing partnership with the agency, carrying out restoration and active forest management through grants and cooperative agreements that bring significant federal, state, and private funding—along with technical expertise and additional partners—to improve fisheries productivity and watershed health on National Forest System lands. We leverage the Forest Service's limited resources by bringing in additional funding, technical expertise, and new partners to the table, amplifying the impact of shared conservation goals.

On Prince of Wales Island, this work includes partnering with the Forest Service, NOAA, and local contractors to replace failing culverts and reconnect fragmented fish habitat. In the next two years alone, Trout Unlimited is slated to replace three crossings in the Shaheen watershed and one crossing in the Staney watershed; other funded projects are adjacent to the Logjam watershed.

We appreciate the Forest Service's considerable investments in watershed restoration and fish passage in recent years, including the forest-wide Fish Passage Restoration initiative and restoration work in the Shaheen and Staney watersheds—a reflection of our shared commitment to restore watershed health—and we offer these comments in that same collaborative spirit.

Our central message is straightforward. As proposed, Twin Mountain II represents one of the largest project-specific old-growth offerings on the Tongass in more than a decade, a sharp reversal of the young-growth transition directed in the 2016 Tongass Land Management Plan Amendment. Old-growth logging and roadbuilding would be concentrated in watersheds on central and northern Prince of Wales Island that have already absorbed extensive harvest and roading—areas that the Forest Service and its partners are actively working to restore. **We urge the Forest Service to substantially reduce the project’s footprint and to adopt the fish and watershed protections described below.**

I. Salmon and recreation are the Tongass’s most valuable forest products.

The Tongass is the nation’s top salmon-producing forest, home to more salmon than all other national forests combined, and its productive salmon streams, intact fish and wildlife habitat, and scenic beauty are the foundation of Southeast Alaska’s economy. Sport, commercial, and subsistence fishing contribute roughly \$1 billion to the regional economy in strong years (TCW Economics 2010), and the Tongass produces about 79 percent of the regional salmon catch (Johnson et al. 2019).

More than 1.3 million out-of-state visitors come to the region each year, and the visitor industry is now the largest private-sector employer in Southeast Alaska, supporting more than 8,500 jobs and \$367 million in wages in 2024 (Southeast Conference 2025). Together, the seafood and visitor industries account for about 26 percent of regional employment, while the timber industry has provided one percent or less of regional jobs for at least two decades (Southeast Conference 2025).

These industries—and Southeast Alaska’s hunting, fishing, and subsistence traditions—depend on healthy watersheds, intact fish and wildlife habitat, and the undeveloped, scenic character of the forest. Visitors and recreationists do not travel to the Tongass to hike through clearcuts; they come for its wild salmon runs, abundant wildlife, and intact viewsheds. The Final EIS should fully explain the impacts of each alternative on recreation, tourism, and subsistence uses within the project area.

The Twin Mountain II project area sits squarely within this fabric, encompassing roughly 935 miles of Class I (anadromous and high-value resident fish) stream, 363 miles of Class II stream, and 995 miles of Class III stream, along with several priority restoration watersheds. **The question before the agency is therefore not simply how much timber to offer, but whether to place that timber ahead of the fish, wildlife, recreation, and water resources that anchor the regional economy and Southeast Alaska’s unique way of life.**

II. The project’s scale, old-growth focus, and location are out of step with the best available science and the agency’s own priorities.

Under Alternative 2, the project would offer up to 26.8 million board feet (MMBF) of old-growth timber from approximately 1,655 acres. This offering is concentrated on northern Prince of Wales Island, where the most productive old growth has already been disproportionately logged. On northern Prince of Wales Island, about 94 percent of the large-tree contiguous old-growth stands have been harvested since 1954 (Albert and Schoen 2013). This large-tree old growth—historically less than five percent of the forest—provides the stream shading, large-wood recruitment, and watershed integrity that salmon and trout depend on, and the winter range that sustains Sitka black-tailed deer. A significant old-growth offering in this already heavily altered landscape compounds well-documented impacts to important fish and wildlife habitat.

The DEIS reports that 44 project-area watersheds have been harvested within the last 30 years, including up to 61 percent of the watershed in Yatuk Creek. Several project-area watersheds are the focus of active or planned restoration, including Shaheen—a priority watershed with a signed Watershed Restoration Action Plan—Staney, Logjam, Sarkar, Naukati, and Red Bay. It is difficult to reconcile a major new old-growth offering and its associated road network with the substantial public and partner investment already being made to restore these same watersheds. As proposed, this project undermines the substantial public and partner investment already committed to restoring these watersheds.

Trout Unlimited supports sustainable, appropriately scaled young-growth harvest, precommercial thinning, and integrated restoration projects designed for local and regional processing. The 2016 Forest Plan Amendment is premised on a transition away from old growth and toward young-growth management, yet this project would direct a large old-growth offering onto the few remaining big-tree stands in one of the most heavily logged landscapes on Prince of Wales and the entire forest.

This tension is heightened by project timing. The Forest Service is currently revising the Tongass Forest Plan, including the management direction for watersheds in this project area. Committing the agency to another large-scale old-growth timber sale while the forest plan is being revised gains little and risks much. A decision issued in this window is more likely to require reconciliation with the revised plan—or to draw challenges premised on the changed planning and regulatory landscape—than one made after the Forest Plan revision is complete.

Trout Unlimited notes that no harvest units, new road construction, or reopened haul roads are proposed within the Tongass 77 watersheds, TNC/Audubon Conservation Priority Areas, or the five inventoried roadless areas (totaling 45,184 acres) that intersect the project area, which is consistent with the objectives for these areas. We also appreciate that the DEIS analyzes specific, mapped harvest units through site-specific unit cards (Appendix A) rather than a condition-based approach; site-specific analysis better informs both the public and the decision-maker, and TU supports its use here.

If the Twin Mountain II project moves forward, Trout Unlimited requests that any Record of Decision authorize only the units, roads, and haul routes analyzed in the DEIS. TU also urges the agency not to adopt any project-specific Forest Plan amendment for Twin Mountain II that would relax forest-wide standards, which would undercut the consistency and integrity of the Forest Plan.

III. ANILCA Section 810 requires the Forest Service to minimize subsistence impacts—and supports analysis of a reduced-impact alternative.

The DEIS makes a significant finding under Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). Both action alternatives “present a significant possibility of a significant restriction of subsistence uses” of deer, driven by reductions in deer habitat quality, connectivity, and carrying capacity related to past timber harvest and roadbuilding. ANILCA Section 810(a) requires that, before authorizing a project that may significantly restrict subsistence uses, the Forest Service must determine that (a) the restriction is necessary and consistent with sound management of the public lands; (b) the action involves the minimal amount of public land necessary to accomplish its purposes; and (c) reasonable steps will be taken to minimize adverse impacts on subsistence uses and resources (ANILCA § 810(a)).

These determinations are incompatible with Alternative 2. The DEIS demonstrates that Alternative 3 would meet the project's stated purpose while reducing impacts—although much more could be done to reduce potentially adverse impacts. Alternative 3 lowers the old-growth offering from 26.8 to 15.5 MMBF, reduces new road–stream crossings from 81 to 52 (including a reduction in new Class I and Class II fish-stream crossings from six to two), cuts new temporary road from 12.4 to 6.1 miles, and is characterized by the agency as posing the lowest risk to water resources of the action alternatives. If a smaller-footprint alternative can deliver the project's purpose with markedly less harm to subsistence resources and fish habitat, the agency cannot readily conclude that the larger alternative involves only the “minimal amount” of public land necessary or reflects “reasonable steps” to minimize subsistence impacts.

Trout Unlimited requests that the Forest Service develop and analyze an additional alternative that further reduces the project's footprint—one that minimizes new road construction, dramatically reduces new Class I and Class II fish-stream crossings, defers harvest in the most heavily impacted and restoration-priority watersheds, and concentrates any harvest where effects to subsistence resources, including deer, are demonstrably lowest. Such an alternative would respond directly to the Section 810 finding and would give the Responsible Official a genuine opportunity to select the least-impactful means of meeting the purpose and need.

At the same time, TU recognizes that the Forest Service may elect to proceed with one of the alternatives now before it. Whichever alternative is selected, the agency has an obligation to take reasonable steps to minimize adverse impacts on subsistence uses and resources. We offer the following recommendations in that vein and encourage the Forest Service to incorporate these measures as binding design criteria and Record of Decision commitments, not discretionary considerations.

IV. Recommendations to minimize and mitigate impacts to fish and watershed resources.

The following recommendations apply at the project and watershed scale and are designed to reduce impacts to fish habitat and water quality under any alternative the Forest Service selects.

1. **Minimize new roads and eliminate new stream crossings.** Roads and their stream crossings are the primary mechanism by which timber projects deliver sediment to salmon streams, and the DEIS confirms that road crossings are where road-generated sediment enters streams. TU recommends that the Forest Service minimize new National Forest System and temporary road construction and, at a minimum, eliminate the new Class I and Class II stream crossings proposed under the action alternatives (six under Alternative 2; two under Alternative 3). Where haul routes parallel fish habitat—roughly 48 to 52 miles fall within 300 feet of fish habitat, depending on the alternative—routes should be relocated outside that zone wherever feasible.
2. **Hold all crossings to current fish passage standards, and close roads promptly.** Any new or replaced stream crossing should be designed to meet Forest Service aquatic organism passage (AOP) standards and be consistent with the forest-wide Fish Passage Restoration initiative. Currently, there is a documented backlog of approximately 1,100 crossings across the Tongass—about 30 percent of all crossings over fish habitat on the forest—that do not meet federal standards (U.S. Forest Service 2019). New roads should not be left open for extended post-harvest firewood or biomass access (the DEIS contemplates up to five years) because prompt decommissioning of temporary roads and storage of system roads reduces chronic sediment delivery and the risk of drainage-related failures. We offer this

recommendation as a partner in the agency’s restoration program. Every new crossing and mile of road in fish-producing watersheds adds to the maintenance and remediation backlog that TU and the Forest Service are jointly working to reduce.

3. **Protect riparian function and large-wood recruitment.** TU recommends that the Forest Service apply—and where feasible, expand—no-cut riparian buffers on fish-bearing streams. Consistent with TU’s Forest Plan Revision comments and the best available science, we urge the agency to consider 300-foot buffers for activities near fish-bearing streams, as is standard under the Northwest Forest Plan (Flitcroft et al. 2022), and to ensure windfirm buffer design. The DEIS notes that key in-stream wood loses stability after roughly 60 years, and that the loss of riparian large wood from past harvest contributed to the 2020 storm damage and channel instability in the Shaheen watershed. Maintaining riparian forest along project-area streams guards against a repeat of those impacts.
4. **Defer activity in the most heavily impacted and restoration-priority watersheds.** TU recommends that the Forest Service avoid additional harvest and roadbuilding in and adjacent to watersheds that are already heavily altered or are the focus of restoration—including Shaheen, Staney, Logjam, Sarkar, Naukati, and Red Bay. In Yatuk Creek—a project-area watershed that exceeds both the 29 percent harvest threshold for peak-flow effects and the two percent roaded-area threshold—no additional harvest or road construction should be authorized until the peak-flow analysis is completed and it is determined that the watershed can absorb additional disturbance.
5. **Prioritize and expand the restoration component of the project.** Project haul routes would cross more than 50 “red” stream crossings that are existing barriers to fish passage (DEIS Ch. 3, Fig. 20). In prior comments, TU has consistently urged the Forest Service to make watershed and habitat restoration a larger component of forest management projects, and a project area home to multiple Watershed Restoration Action Plans is well suited to that approach. We encourage the Forest Service to integrate AOP replacement, in-stream and riparian restoration, and precommercial thinning that improves deer and salmon habitat as funded, front-loaded elements of this project rather than aspirational add-ons.
6. **Maintain old-growth connectivity, wildlife conservation measures, and climate resilience.** TU recommends that the Forest Service carry forward, as minimums in any alternative, the wildlife conservation measures developed for Alternative 3—including the emphasis on landscape connectivity and deer travel corridors—and that it meet, not merely approach, Forest Plan standards for deer habitat capability and road density. Given documented declines in Prince of Wales deer densities (Hasbrouck 2023; Robbins 2025) and elevated road densities on the island, those standards should function as firm constraints. Finally, research indicates that watersheds retaining more than 42 percent old growth provide important thermal refuge for fish (Flitcroft et al. 2022); protecting that refugia value should inform where, and whether, harvest occurs.

V. The Final EIS should complete and strengthen its analysis.

NEPA requires the Forest Service to take a hard look at the project’s potential impacts, including cumulative effects. Two analytical gaps should be addressed before any decision. First, the DEIS states that its peak-flow analysis “will be updated for the final EIS” and that its watershed analysis assumes 100 percent harvest on lands of other ownership. These are material assumptions in a mixed-ownership landscape, and the completed analysis should be disclosed for public review before the agency relies on it. Second, the cumulative-effects

analysis should evaluate watershed-scale effects on salmon habitat and productivity rather than treating localized impacts as acceptable because the larger system can absorb them. This approach is supported by recent salmon conservation science (Bellmore et al. 2024) and warranted by the reasonably foreseeable future actions identified in Appendix C. The Final EIS should also fully disclose the basis for the Section 810 determinations, including the specific steps the agency will take to minimize subsistence impacts.

VI. Questions for the Forest Service

Trout Unlimited respectfully requests that the Final EIS address the following:

- What specific measures will the agency adopt to satisfy the Section 810 obligation to minimize adverse impacts on subsistence uses, and how will their effectiveness be monitored?
- How did the agency weigh regional demand for old-growth timber against the economic and subsistence value of the non-timber uses the project may adversely impact—subsistence harvest and food security, guided sport fishing and hunting, tourism, and commercial fishing—given that the seafood and visitor sectors generate significantly more wages, jobs, and economic activity than the timber industry?
- Which proposed units and stream crossings fall within 300 feet of Class I and Class II streams, and how will the agency guarantee that all crossings meet AOP standards?
- How will the Final EIS update the Yatuk Creek peak-flow analysis and the mixed-ownership harvest assumptions?
- What options did the agency consider to meet the needs of small timber operators on Prince of Wales Island before offering a large old-growth sale?

VII. Conclusion

Trout Unlimited remains a committed partner in the Forest Service’s restoration mission. But the Twin Mountain II project, as proposed, would direct large-scale old-growth timber harvest and an extensive road network into watersheds on northern Prince of Wales Island that are already degraded and that the Forest Service and its partners are working to restore. We urge the agency to analyze a reduced-impact alternative responsive to its own Section 810 finding and—regardless of the alternative selected—to adopt the fish and watershed safeguards described above as binding commitments. We appreciate your consideration and remain a steadfast partner in our shared fish habitat restoration efforts on Prince of Wales Island.

Respectfully,



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KEY REFERENCES

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