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Organization: Southeast Alaska Conservation Council

Title: Environmental Policy Analyst

Comments: Re: Twin Mountain II Timber Sale [ndash] Project Scoping Comments

Dear Mr. Stewart:

Please accept the following scoping comments on the Notice of Intent for the Twin Mountain II Timber Sale on behalf of the Southeast Alaska Conservation Council (SEACC). SEACC is a grassroots organization representing more than 7,000 supporters. For fifty years, SEACC has been bringing together diverse Alaskans from our region's 32 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 commercial fishing, tourism and recreation.

I. Summary of the Project

The scoping notice states that the Forest Service proposes to make up to 3,000 acres of old-growth timber (with approximately 42 million board feet (MMBF)) available to offer for harvest, construct approximately 3 miles of new roads, 11 miles of temporary roads, and reconditioning 35 miles of existing roads in the Staney and Red Bay areas within the Thorne Bay Ranger District. In addition, existing log transfer facilities at El Capitan, Exchange Cove, Lab Bay, Naukati, and Winter Harbor would be made available if needed. Clearcuts would generate the bulk of the timber volume on approximately 1,800 acres, with another 1,200 acres slated for uneven-aged management. Project implementation would occur over the course of 5 to 10 years.

II. Comments on process

The scoping notice for the Twin Mountain II Timber Sale was issued on September 14, 2020, the date on which updates to the National Environmental Policy Act regulations issued by the Trump administration took effect.¹ You have since clarified, however, that this scoping effort is being initiated under the 1978 NEPA rules.² Under these rules, the U.S. Forest Service must take a hard look at the direct and indirect effects, and the cumulative effects of the proposed action, including assessment of impacts that are geographically or temporally distant. Furthermore, under these same rules, [dquo]all[emphasis added] reasonable alternatives must be rigorously and objectively evaluated.[rdquo]³

Also required under NEPA, a draft EIS must take into full account the comments received as part of this scoping process. However, the 30-day comment period for this scoping effort coincides with the issuance of the final EIS for the Alaska Roadless Rule and the 45-day comment period for the draft EIS for the South Revilla Integrated Resources Project. These environmental documents issued for overlapping public review periods severely burden affected Southeast Alaskans who depend on the Tongass National Forest for an array of uses and livelihoods and limit their capacity to respond and provide meaningful input on these documents, including the scoping effort for the Twin Mountain II timber sale at issue here. We further object to the Forest Service's decision to not hold public meetings and subsistence hearings as part of this scoping process. Given the extensive logging and roadbuilding activity that has occurred and continues to occur on Prince of Wales, the impacts to, and potential conflicts with, local communities, residents, and subsistence, recreation and tourism only increase with each passing year. The USFS should provide the public the opportunity to share their concerns in a public setting and provide input on these potential impacts and how alternatives could reduce those impacts.

III. General Comments

SEACC opposes further industrial scale harvest of old growth on Prince of Wales. Contiguous high-volume old growth forest in northern Prince of Wales, including the project area, has been reduced by 93.8% between 1954 and 2004.⁴ Due to historic and ongoing logging and roadbuilding on multiple ownerships on this island, including U.S. Forest Service land, Native corporation land, University Land, and Mental Health Trust land, remaining old-growth forests on Prince of Wales are becoming increasingly depleted and fragmented resulting in a significant loss of habitat that is important for many species. These forests will require centuries to return to their original level of ecologic productivity. Old growth forests provide essential habitat for deer, bears, wolves, martens, flying squirrels and goshawk among other species, as part of a complex ecosystem that also supports thriving watersheds for salmon habitat. The nature of island ecology is that terrestrial species are confined and cannot migrate to new habitat, risking extirpation and irreversible loss of biodiversity.

Of particular concern are the units that fall within the Stoney Creek portion of this sale. Stoney Creek has been identified by the USFS as a priority watershed.⁵ Further timber harvests in the vicinity of this watershed add to the cumulative impacts this important waterbody is already weathering from harvests on non-NFS ownerships. Both the state and Alaska Mental Health Trust plan or have had past harvest activity in the Control Lake area that on their own pose significant degradation to Sitka black-tailed deer habitat and Stoney watershed health. From a forest management standpoint, it is not enough for the USFS to simply acknowledge the larger context and cumulative impacts that logging and roadbuilding in multiple adjacent ownerships have on the remaining high volume old grow stands on Prince of Wales. It must act as a responsible forest manager to deliberately curtail those impacts by ending further old growth harvests on Forest Service land.

On Prince of Wales alone, there are already at least 2800 miles of roads.⁶ Forest roads contribute to silting, turbidity and erosion and create stormwater runoff that impacts streams. They fragment habitat and routinely contribute to the introduction of invasive species, a problem that will cost the U.S. Forest Service upwards of \$3.6 million over the next ten years in the northern Tongass and Wrangell-Petersburg areas.⁷ ⁸ Roads constructed in karst areas have fragile, porous aquifer systems that are highly vulnerable to water quality impacts from logging-related road construction, traffic, and fuel spills that can cause irreversible damage. Karst features are documented in both the Stoney and Red Bay areas of the project. For all of these reasons SEACC opposes the construction of an additional 14 miles of roads planned for this project and request that alternatives developed must consider no new road construction.

IV. Purpose and Need for the Action

We disagree that [i]there is a need to provide a sustainable level of forest products to contribute to the economic sustainability of the region. Providing old-growth timber would preserve a viable timber industry by providing timber volume in an economically efficient manner while providing jobs and opportunities for Southeast Alaska residents.[r] There is not a need. The State of Alaska Division of Forestry currently has approximately 45 mmbf under contract in the Southeast State Forest, and the draft Five Year Schedule of Timber Sales has identified nearly 77 mmbf to be offered over the next five years.⁹ For the Haines State Forest, the current Five Year Schedule of Timber Sales has identified 48.4 mmbf. The Alaska Mental Health Trust[r]s (AMHT) Naukati Exchange Timber Sale is providing 100 mmbf over the next 10 years and the Trust has smaller sales in Icy Bay and near Kasaan.¹⁰ The AMHT also has just issued a notice of a best interest decision to offer another 100 mmbf of old growth near Shelter Cove on S. Revilla Island.¹¹ In February of 2019, officials with Sealaska Corporation declared that it [i]ntends to harvest 55-65 MBF per year from its timber base on Prince of Wales Island[r] and its [i]cy Bay stumpage over the next two years [2020-2021] will add another 10-20 MBF per year.[r]¹² Meanwhile, the volume of timber remaining under contract on the National Forest totals 53 mmbf.¹³ This does not include settlement sales and additional smaller timber sale offerings described in the 5-Year Timber Sale Schedule 2021-2025.¹⁴ Nor does it include other harvests occurring on village corporation lands. When tallied together, the known timber volume under contract or slated to be offered totals nearly 500 mmbf. That averages 100 mmbf a year for the next five years. In addition, the USFS granted

three-year extensions to all timber contracts on the Tongass where harvests may have slowed or stopped in 2019-2020 due to trade wars and the coronavirus pandemic, underscoring the lack of justified need for additional timber volume on top of what is already in play.¹⁵

Two land exchanges have occurred over the past 6 years impacting the Tongass. The Sealaska Lands Bill of 2014 conveyed 70,075 acres of National Forest System lands to Sealaska Corporation,¹⁶ and the Mental Health Trust Land Exchange Act of 2017 will ultimately convey an estimated 20,580 acres of forested National Forest lands.¹⁷ If the U.S. Forest Service transfers high volume old growth forested lands out of the National Forest system to landowners who then log those lands under the more permissive laws of the Alaska Forest Resources & Practices Act and implementing regulations,¹⁸ including former inventoried roadless areas, that timber harvest should be factored into the annual projected timber sale quantity. Upon doing so, the U.S. Forest need not continue to offer wasteful Tongass timber sales subsidized on the backs of taxpayers, which in 2019 cost the American public more than \$16 million.¹⁹ Based on this extraordinary waste, as documented by Taxpayers for Common Sense, we also find the statement in the Purpose and Need for Action, [“]providing old-growth timber would preserve a viable timber industry by providing timber volume in an economically efficient [emphasis added] manner[”] to be completely false. Furthermore, the increasingly tiresome notion trotted out by industry and the agency, that more timber will create more jobs, lacks all basis, since up to 50% of Tongass old growth and 100% of young growth is routinely exported without processing by local mill workers.

The USDA’s 2016 projections of Tongass National Forest timber demand suggest that harvests on other ownerships were factored into the calculation of a projected timber sale quantity (PTSQ) of 46 mmbf per year from the Tongass.²⁰ This PTSQ forms the basis for the 2016 Tongass Forest Land Management Plan’s timber objective.²¹ We believe this analysis is now outdated given the above factors as well as timber market changes, the U.S. [dash] China trade war and economic downturn resulting from the coronavirus pandemic, and should no longer be used by the Forest Service as the basis for offering additional timber sales on the Tongass. The bottom line is that there is no need for the timber volume proposed for sale under the Twin Mountain II Timber Sale project.

V. The Forest Service must acknowledge the importance of old growth forests for carbon sequestration.

NEPA and the National Forest Management Act (NFMA) require the Forest Service to use high quality, accurate, scientific information to assess the effects of a proposed action on the environment.²² The Forest Service, in its analysis for the DEIS must 1) recognize the global importance of the Tongass for carbon storage, 2) use an appropriate scale of analysis that assesses the value of the Tongass and the effects of the proposed action under consideration, and 3) disclose and analyze credible information showing that old growth forests in the Tongass store substantially more carbon than saw logs and young growth.²³ In the FEIS for the 2016 Tongass Plan, the Forest Service recognized that the Tongass is [“]a critical component in the global carbon cycle[”] and that management actions on the Tongass can [“]affect climate change at a local, regional, and global scale.[”] In keeping with that conclusion, the Forest Service must acknowledge and study the effect that logging and roadbuilding in this project will have, both on its own and in combination with historic, ongoing and foreseeable future logging and roadbuilding, on carbon sequestration or climate change.²⁴ The DEIS must also address the multitude of credible, scientific studies, described in detail in the report by Dr. DellaSala and Dr. Buma, that support the conclusion that temperate rainforests in general, and the Tongass particular, are globally important carbon sinks.²⁵ With these forests dwindling quickly on an international scale, scientists recommend protecting remaining intact areas, not logging them. The International Panel on Climate Change has similarly recommended avoiding land sector emissions[mdash]in other words, keeping trees standing.²⁶ Indeed, the catastrophic loss of millions of acres of forest in the American west this past season should give the Forest Service serious pause when it comes to moving forward with yet more old growth timber sales on the Tongass.

The Forest Service must also accept the scientific consensus that saw logs and eventual young growth do not

store just as much carbon as standing old-growth forests.²⁷ This is in line with the Forest Service's own conclusions in the 2016 Tongass Plan Amendment FEIS, which acknowledged that logging old growth results in increased emissions because some wood is lost to sawdust, and furniture and other wood products degrade or are destroyed and release stored carbon.²⁸ The report prepared by Dr. DellaSala and Dr. Buma confirms this analysis and shows that the contiguous old growth areas of the Tongass stores significantly more carbon than saw logs or young growth. The Forest Service must address this information in the DEIS.

In addition, the analysis in the DEIS must not minimize the importance of Tongass old growth forests for carbon storage by using an inappropriate scale of comparison for this project. The Forest Service should provide a comparison of the emissions of each alternative so that the public and decisionmakers can compare the greenhouse gas contributions of each alternative. These emissions should be compared to regional or local emissions, not global or total US power sector emissions, to provide a more meaningful basis of comparison.²⁹

VI. Alternatives

We request the USFS develop an alternative that does the following:

- 1) Provides small scale harvest offerings that conserve natural resources and aesthetic values and prioritize sustainable, value-added wood products industries in Southeast Alaska that strengthen local economies, rather than businesses dependent on round log exports.
- 2) Engages with the Tribes of Kasaan, Klawock, and Hydaburg to identify and set aside specific acres for cultural harvest of red and yellow cedar, the latter of which is becoming increasingly endangered and therefore poses a risk to southeast Alaska indigenous heritage; and provides an economic assessment that calculates the local demand in Southeast Alaska for cultural use of wood and wood products by carvers, artists, and local business owners working in Pacific Northwest art traditions;³⁰
- 3) Addresses the backlog of restoration and recreation infrastructure work on Prince of Wales, where the U.S. Forest Service has cited more than \$10 million in unfunded restoration work and deferred maintenance for recreational facilities, beyond that which is described in the out-year plan for the Prince of Wales Landscape Level Analysis. ³¹ ³² Funding restoration and recreation projects that provide valuable jobs at a critical time for forest workers, Tribal organizations, and community residents throughout Prince of Wales, is a far more sustainable investment for the American taxpayer than logging and roadbuilding.
- 4) Prioritizes habitat restoration and enhancements that specifically improve ecological resilience in the face of a rapidly changing climate and improves habitat productivity for our fish and wildlife populations. Young-growth stands in particular should be targeted for maintaining, prolonging, and/or improving understory forage production and accelerating development of old-growth characteristics for deer, bear, marten, wolf, goshawk, murrelets, ermine, and flying squirrel. This young-growth management work benefits the forest, provides jobs, and improves [ldquo]hunt-ability[rdquo] that sustains subsistence activities. Restoration work should also prioritize fish habitat improvements that address much needed stream restoration and fish passage repairs throughout the island's world class watersheds. These watersheds are essential for subsistence, sport fishing and Southeast Alaska's world class commercial fisheries.
- 5) The Forest Service must provide an economic analysis of the costs and benefits of this alternative, including the financial impacts and job creation that will result from its implementation, so that the public can sufficiently compare all the alternatives on a cost-benefit basis. In addition to other regional economic impact studies on the multiple uses and benefits of the Tongass, the Forest Service should review and incorporate relevant data and conclusions found in the University of Oregon's [ldquo]Social and Economic Monitoring of the Tongass National Forest and Southeast Alaska communities: Monitoring Plan and Baseline Report.[rdquo]³³ The analysis must include an assessment of the region's economic contributions from the harvest and cultural use of

wood and wood products by carvers, artists, and local business owners working in Pacific Northwest art traditions as described above, as well as the traditional (Indigenous), hunting, fishing, tourism, restoration and outdoor recreation economies that surpass the timber industry in the Southeast regional economy.

In our view, an alternative with the features described above is far more responsive to the multiple use objectives under the National Forest Management Act.³⁴ This alternative not only will provide immediate jobs for small timber operators, local mills and Native artisans, but improvements to fish and wildlife habitat will also generate employment. This in turn will support our commercial fisheries, subsistence hunting and fishing and outfitter guiding, and infrastructure improvements support the growing outdoor recreation and tourism sectors on Prince of Wales. This alternative prioritizes and protects the value of old growth Tongass forests for carbon in the face of climate change and will make our region more economically and culturally vibrant, and climate resilient.

We appreciate the opportunity to comment.