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Title:

Comments: Re: Thomas Bay Young-Growth Timber Sale Project

ID Team Leader Case,

Thank you for the opportunity to comment on the Thomas Bay Young-Growth Timber Sale Project. These comments are submitted on behalf of Southeast Alaska Conservation Council, a nonprofit environmental organization dedicated to safeguarding the integrity of Southeast Alaska's unsurpassed natural environment while providing for balanced, sustainable use of our region's resources.

SEACC offers the following comments on the proposed young-growth timber sale on the Petersburg Ranger District, at Thomas Bay. While we support the Forest Service's efforts to continue advancing the transition away from old-growth logging, we have some serious concerns regarding this particular sale, which at approximately 840 acres and 22 million board feet of timber, is a relatively large sale impacting a substantial area near Thomas Bay.

This project also proposes to:

- *Build 0.6 miles of temporary road

- *Reconstruct 6.5 miles of decommissioned temporary road

- *Employ clearcut harvest methods

Id. While the scoping notice does not delineate the type of harvest method to be used, the Forest Service IDT Leader confirmed: "You are correct, we are proposing clearcutting."

We request that the Forest Service prepare an Environmental Assessment for this project.

The project clearly has potential for significant impacts: it will clearcut over a square mile of forest, requiring 7 miles of road construction or reconstruction. It will set an ecosystem recovering from decades-old clearcuts back to zero. It will modify whatever habitat and carbon storage values and services the existing second-growth forest is now providing. Combined with management actions proposed on adjacent lands managed by State and other landowners, it is guaranteed to have cumulative impacts. The project may set a precedent for future actions because it is one of the first and largest young growth sales offered on the Forest. For these and other reasons, an environmental assessment should be required.

Our main concern with this sale is its size and the stated goal of a five to 10 year supply of timber.

SEACC requests that the Forest Service break this sale up into individual smaller sales, with small local mills in mind, rather than offering the sale in its entirety, at scale. From the map of the sale area, twelve individual units are identified. This should make it easier to break the sale into those smaller units. By offering the sale in smaller pieces, the Forest's goal of helping small regional/local operators is better advanced; in addition, the timber supply can be sustained for a longer period of time if packaged this way, which benefits all involved, and both anticipates and is responsive to high-level guidance being provided by the USDA through the Southeast Alaska Sustainability Strategy.

SEACC suggests that the Forest Service revise its Purpose and Need for this project to reflect the new Tongass management direction by the Biden-Harris Administration, which states:

"As a key part of Southeast Alaska Sustainability Strategy, USDA will end large-scale old-growth timber sales on

the Tongass National Forest and will instead focus management resources to support forest restoration, recreation, and resilience, including for climate, wildlife habit, and watershed improvement."

This sale, as currently offered, does not appear to be aligned with this new direction; it calls for a large young growth sale and the harvest method is proposed to be a clearcut. There does not appear to be much about this sale that reflects the new management priorities for the Tongass National Forest.

We urge the Forest Service to reconsider the Purpose and Need. We note that the timing of this sale, in conjunction with the new direction for Tongass management from the Biden Administration, makes a fresh approach doubly appropriate. New priorities for Forest management, as stated by the USDA (see citation three), include "recreation, restoration, and resilience." We strongly encourage the FS to look for ways to package this sale in terms of wildlife habitat enhancement for certain units where that approach may be possible and/or productive. Searching out ways to harvest this timber as responsibly as possible is also vitally important. SEACC strongly urges the Forest Service to use a different harvest method for this sale. We suggest using a selective harvest method: smaller clearcuts, commercial or pre-commercial thinning, leave strips and patches, or other harvest method that "thinks out of the box" and provides a fresh approach to timber harvest, aligning with new national management guidance. More information about how a different harvest approach might impact the project in terms of: road-building, habitat enhancement, impacts to streams within the project area, and economics is vital going forward and would be addressed in an Environmental Assessment. In the scoping document, four Land Use Designation areas (LUDs) are identified. Two of the four are non-harvest LUDs (Semi-Remote Recreation, Old Growth Habitat), according to the Forest Plan. It would be helpful to see if and where the Old Growth Habitat LUD areas in this project overlap or connect with the young growth areas (both those defined for harvest in this project and those YG areas which will be left unharvested currently, as viewed in the project map). More details are vital regarding the LUD acreage associated with the sale, and especially regarding the harvest method; even in one of two project area LUDs that allow for harvest (Scenic Viewshed), clearcutting is supposed to be limited as per the Forest Plan's Objectives for the Scenic Viewshed LUD:

"Seek to reduce clearcutting when other methods will meet land management objectives."

Since the harvest area is young growth, land management objectives for this area include pre-commercial thinning, providing approximately three years timber supply to local mills (this sale could provide more than that for small operators), and "maintain or improve habitat for wildlife and fish at the stand or landscape level." SEACC believes these objectives could be better met with a different harvest method. This issue also falls under NEPA direction regarding alternative consideration and development:

CEQ's 1978 regulations, which apply to all NEPA documents, not just EISs, require that agencies "to the fullest extent possible ... [i]mplement procedures ... to emphasize real environmental issues and alternatives" and to "use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment."

Supporting legal precedents:

Gifford Pinchot Task Force v. Perez, 2014 U.S. Dist. Lexis 90631, No. 03:13-cv-00810-HZ (D. Or. July 3, 2014) (finding agency failed to consider range of reasonable alternatives in an EA);

Davis v. Mineta, 302 F.3d 1104, 1120 (10th Cir. 2002) (granting injunction where EA failed to consider reasonable alternatives)

From a cumulative effect standpoint, and according to 2016's Forest Management Plan, the old-growth forest habitat within the area should be left undisturbed and, if possible, corridor connections between more mature young-growth areas and old-growth habitat should be maintained or created, and not destroyed anew. That action literally undercuts one of the major goals of the Forest transition and current management guidance. SEACC also recommends that receipts from this sale help support maintenance of recreation infrastructure in this area.

Another, perhaps more significant, issue is that up to 75% of the units delineated for harvest as part of this sale lie within currently proposed Alaska Native Landless selection areas. As per the Biden Administration's new Southeast Alaska Sustainability Strategy priorities, we request that the Forest Service consult any and all Tribal entities potentially affected by this particular Landless selection, and address any concerns they may have with the proposed harvest location.

Finally, while we support providing a variety of resources that contribute to the local and regional economies of Southeast Alaska, we would like an answer from the Forest Service regarding how, in the Agency's view, allowing buyers to send raw logs to Asia for processing develops or enhances new markets for young growth products manufactured in Southeast Alaska. SEACC is supportive of responsible harvest of young growth if it can be used to bolster and support the success of small mills in the region, assuming those small mills do not export this lumber, but process and sell products locally. Successful examples of this model are currently in evidence at a small mill in Coffman Cove on Prince of Wales Island, and also at a small mill in Yakutat. If the Forest Service intends to allow purchasers of this sale to export logs in the round, we suggest accounting for all costs subsidized by U.S. taxpayers and requiring exporters to pay a stumpage premium that covers these costs. We encourage the Forest Service to carefully identify any opportunities for local processing and sale of this young growth wood for local use, including:

- * Building packages, small or large
- * Cultural wood (in consultation with local tribal entities)
- * Firewood
- * Other local uses

Thank you for the opportunity to comment. We look forward to working with the Forest Service on future components of this project moving forward.

Sincerely,

Katie Rooks
Environmental Policy Analyst