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Organization:

Title:

Comments: Subject: Formal Objection to the South Revilla Integrated Resource Project (#53477)

ATTN to Responsible official: Monique Nelson, Forest Supervisor

Reviewing officer: Jerry Ingersoll, Acting Regional Forester, Alaska Region

Dear Monique, Jerry and team,

I am writing to formally object to the South Revilla Integrated Resource Project proposed within the Tongass National Forest on Revillagigedo Island. Based on the environmental record and governing federal laws, the project raises serious legal and ecological concerns that warrant denial or substantial revision.

1. Inadequate Analysis Under the National Environmental Policy Act (NEPA)

Under the National Environmental Policy Act, federal agencies must take a "hard look" at the environmental consequences of proposed actions and consider reasonable alternatives.

The South Revilla Project proposes extensive old-growth logging and road construction in one of the world's largest intact temperate rainforests. However, the environmental analysis appears insufficient in several respects:

- * Failure to adequately analyze climate impacts. The Tongass contains one of the largest carbon stores in the national forest system. Logging old-growth forests releases stored carbon and reduces future sequestration capacity. NEPA requires meaningful analysis of these climate consequences and the cumulative greenhouse gas impacts of removing old-growth forests.

- * Inadequate cumulative impacts analysis. The project must evaluate the cumulative impacts of past, present, and reasonably foreseeable logging and road construction across Revillagigedo Island and the broader Tongass landscape.

- * Failure to rigorously evaluate reasonable alternatives. NEPA requires serious consideration of alternatives that would avoid significant environmental damage, including alternatives that eliminate old-growth harvest and focus on restoration or second-growth management.

Without a thorough analysis of these impacts and alternatives, the project does not satisfy NEPA's procedural requirements.

2. Impacts to Fish Habitat and Watersheds

The Tongass is globally significant for its salmon streams. Increased sedimentation from logging, road construction, and landslides threatens spawning beds and water quality in salmon-bearing watersheds.

These impacts raise concerns under the Clean Water Act, which requires federal actions to avoid degradation of water quality and protect aquatic ecosystems. Increased sediment delivery and altered hydrology from logging roads can directly undermine these protections.

Salmon are a keystone species whose health supports wildlife, subsistence use, and the regional economy.

Degradation of these watersheds would cause cascading ecological and economic harm.

3. Conflict With the Tongass Land and Resource Management Plan

The project must comply with the Tongass Land and Resource Management Plan.

Large-scale old-growth harvest and expanded road infrastructure appear inconsistent with the plan's goals to:

- * Maintain wildlife habitat and biodiversity
- * Protect watershed integrity
- * Transition toward more sustainable forest management

Old-growth forests are critical habitat for species including the Alexander Archipelago wolf and the Sitka black-tailed deer, whose populations depend on intact mature forest ecosystems.

4. Irreversible Loss of Old-Growth Forest

Old-growth ecosystems in the Tongass require centuries to develop. Clearcutting these forests results in long-term ecological damage that cannot be meaningfully mitigated within human timeframes.

These forests provide:

- * Critical wildlife habitat
- * Stable watersheds that support salmon streams
- * Major carbon storage important for climate regulation
- * Intact ecosystems supporting recreation and tourism

The permanent loss of these ecosystems represents one of the most severe environmental consequences of the project.

5. Road Construction and Long-Term Environmental Damage

Road construction associated with the project would fragment intact habitat, increase landslide risks, and alter drainage patterns. Roads also create long-term maintenance liabilities and increase human disturbance in previously undeveloped forest areas.

Such impacts further degrade watershed health and undermine long-term ecosystem resilience.

Conclusion

Because of the project's significant environmental risks and potential legal deficiencies under NEPA, the Clean Water Act, and the Tongass Forest Plan, I respectfully request that the South Revilla Integrated Resource Project (#53477) be withdrawn or substantially revised.

At minimum, the U.S. Forest Service should adopt an alternative that eliminates old-growth logging, protects salmon-bearing watersheds, and prioritizes restoration and second-growth management.

Thank you for considering these concerns during the objection review process.

Sincerely, Elizabeth Davidson