



December 21, 2018

Dave Schmid, Regional Forester
USDA Forest Service, Alaska Region
Attn: POW LLA Objections
709 W. 9th Street
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Dear Regional Forester Schmid,

Please accept these objections submitted on behalf of Trout Unlimited (TU) to the draft Record of Decision (draft ROD)¹ and Final Environmental Impact Statement (FEIS)² for the Prince of Wales Landscape Level Analysis Project (POW LLA), which was prepared for the Thorne Bay and Craig Ranger Districts by Earl Stewart, Forest Supervisor of the Tongass National Forest.

At the outset, we wish to make clear that we commend the Forest Service and its staff for the leadership it has shown through collaboration with stakeholders on Prince of Wales Island and throughout the region. TU has long supported and partnered with the Forest Service on projects that seek to facilitate a more rapid transition out of large-scale old-growth logging while protecting and restoring important fish and wildlife habitat. Much progress has been made in this regard in recent years. TU appreciates the diligent efforts of the Forest Service to facilitate a more sustainable timber industry based on young growth forest products while also attending to the broader needs of the region, including for fishing, hunting, subsistence, outfitting, guiding, tourism and recreation, among other uses. Fishing and tourism, in particular, have become increasingly important to Southeast Alaska and to the regional economy in recent years, and are now the two largest sources of local employment and earnings.³

TU is the nation's largest sportsman's organization dedicated to coldwater conservation with more than 400 chapters and more than 140,000 active members nation-wide. TU has more than 22,000 individual supporters in Alaska that are passionate anglers, lodge owners, fishing and hunting guides, and commercial fishermen, among other various occupations. In addition to members in more remote parts of the state, TU has active chapters in Juneau, on the Kenai Peninsula, in Anchorage and the Mat-SU, and in Fairbanks. Many of TU's members rely on the important fish, wildlife and water resources found on the Tongass for fishing, hunting, recreation, and for employment in related industries such as

¹ USDA, *Prince of Wales Landscape Level Analysis Project Draft Record of Decision*, R10-MB-833i (Oct. 2018).

² USDA, *Prince of Wales Landscape Level Analysis Project Final Environmental Impact Statement*, R10-MB-833e (Oct. 2018).

³ Rain Coast Data, *Southeast Alaska by the Numbers 2017*, prepared for Southeast Conference 4 (Sep 2017). available at

<http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20numbers%202017%20FINAL.pdf>.

fishing and tourism. Prince of Wales Island is a popular destination for anglers and hunters because of its salmon and steelhead runs, cutthroat trout, Dolly Varden, Sitka Black-tail deer, black bear, unique karst features, numerous public use cabins, and growing visitor services infrastructure. TU's membership includes commercial fishers, Alaska Natives, small business owners, and Alaskans from a variety of walks of life.

TU has a long history of working collaboratively with the Forest Service and other stakeholders on the Tongass and elsewhere throughout the National Forest System. TU, in partnership with the Forest Service and The Nature Conservancy, played a major role in the Sal Creek restoration project on Prince of Wales Island, which was completed more than ten years ago and helped lay the foundation for future partnership and restoration projects throughout the forest. In addition to other restoration projects throughout the forest, TU is also an active participant in the Tongass Transition Collaborative, which seeks durable solutions to many of the Tongass' persistent challenges with timber management. Partnering with the Forest Service is critical to TU and to its ability to fulfill its mission. TU is committed, through the investment of significant staff and financial resources, to protecting and restoring important fish, wildlife and water resources on the Tongass, and to ensuring the region's unique wild salmon resources continue to serve as the economic, cultural and spiritual foundation of Southeast Alaska.

We recognize the Forest Service for its efforts in recent years to advance the transition toward more sustainable forest management and away from large-scale old-growth logging as rapidly as possible. Improving protections for important fish and wildlife habitat, enhancing visitor services, and supporting a sustainable forest products industry will enable the Forest Service to increase its support for Southeast Alaska's rural communities and be responsive to the needs of the region. By ending the practice of offering large-scale and unsustainable old-growth timber sales—which undermine the region's largest job-producing industries, cause unnecessary and irreparable harm to important fish and wildlife habitat, and is an antiquated practice that would not exist if not for massive taxpayer subsidy—the Forest Service can establish a legacy of public service and support for local communities that will remain for generations to come.

I. Salmon and Recreation are the Tongass' most Important Forest Products.

The Tongass is the nation's top salmon-producing forest. It's many productive salmon streams, important fish and wildlife habitat, and beautiful scenery are the foundation for the local economy. Sport, commercial and subsistence fishing in Southeast Alaska contributes \$1 billion annually to the regional economy and accounts for 10% of Southeast Alaska's employment.⁴ In addition to this, more than a million out-of-state visitors flock to the Tongass each year, contributing another \$1 billion annually in economic activity and approximately 17% of jobs to the region.⁵ The Southeast Alaska tourism industry is on track for a 30% increase in visitors to the region, bringing total visitation to 1.3 million individuals per year by 2019 and increasing demand for undeveloped, scenic places for recreation along with it. These industries—which have their foundation in healthy watersheds, in-tact fish and wildlife habitat, natural scenic beauty and untouched landscapes—depend heavily on the

⁴ TCW Economics, *Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska*, prepared for Trout Unlimited Alaska 16 (July 2010), available at <http://www.tu.org/sites/www.tu.org/files/documents/EconReportFull.pdf>. The number of jobs supported by salmon fishing and its economic contribution are likely to be even greater today than was indicated since these figures were calculated using data from 2007 and the economy and salmon prices have continued to increase in years since.

⁵ Rain Coast Data, at 4.

Tongass National Forest, which accounts for roughly 80% of the region's land base and produces 79% of the regional salmon catch.⁶

Fishing and tourism far outpace other private-sector sources of employment and earnings, and provide a steady and reliable source of employment and earnings for many Southeast Alaskan communities. Despite decreases in Southeast Alaska's timber industry, Southeast Alaska's population *increased* 7 percent from 2000 to 2012 and personal income *increased* by 17 percent over the same period.⁷ Per capita income for Southeast Alaskans outpaces statewide and national averages while unemployment rates remain lower than statewide or national averages.⁸ Southeast Alaska's economy is buoyed by its healthy fish and wildlife habitat, productive salmon streams and scenic beauty. Managing the Tongass with fish, wildlife and visitor services at the forefront is the key to ensuring local communities and economies are strong and stable.

The significant importance of fishing and recreation is reflected by various statements in the purpose and need for the proposed action and through various recommendations from the Prince of Wales Landscape Assessment Team (POW LAT), including that groups recommendations to prioritize in-stream restoration projects, replacing or eliminating "red pipe" fish blockages, wildlife treatments, recreation trails and facilities, and public education and interpretation.⁹

II. The Forest Service Should Rapidly end Industrial-Scale Old-Growth Logging.

In many regards, Southeast Alaska has already transitioned. Even when timber from private and state lands is included, the timber industry in Southeast Alaska accounts for just a few hundred jobs.¹⁰ It is past time for the Forest Service to catch up with the rest of the region and the nation and shift its Tongass timber program to one that plans and implements appropriately-scaled timber sales based on young-growth forest products that support the region's small mills and encourages local manufacturing.

While timber harvesting once played a historically important role in the economy of Southeast Alaska, recent old-growth timber sales have undercut the Tongass transition, eroded public confidence and trust in the Forest Service, and serve as unnecessary obstacles to the creation of a sustainable forest products industry in the region. Old-growth sales going back to the Log Jam timber sale in 2009, if not before, have been sold to the public as "bridge timber" and as necessary to encourage the forest products industry to transition. However, instead of offering a limited supply of old-growth timber in a way that prudently meters out the remaining old-growth bridge volume over time, the Forest Service has too often maximized the volume of old-growth timber it offers in each sale while continually developing a new backlog of large-scale old-growth timber sales to offer out in the future. Rather than encouraging investment in transition technologies and entrepreneurship within the Tongass timber industry, this scheme encourages the timber industry to dig in its heels against the tides of change and to cut as much as possible as fast as possible with the assurance that future timber sale planning will provide new, highly-subsidized old-growth timber volume.

⁶ U.S. Forest Service, *Tongass Salmon Factsheet 1* (Jun 2013), available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5408056.pdf.

⁷ USDA, *Tongass Land and Resource Management Plan Final Environmental Impact Statement Plan Amendment*, R10-MB-769e at 3-478 (June 2016).

⁸ *Id.* at 3-478 to 479.

⁹ See Prince of Wales Landscape Assessment Team, *Final Recommendations* (June 2017) available at <https://www.powcac.org/s/POWLAT-Final-Package-June-2017.pdf>.

¹⁰ See Rain Coast Data, at 4.

Timber planning too often comes at the expense of the region's strong economic base of fisheries and tourism. Once-productive salmon streams no longer support abundant salmon runs and ample wildlife populations when clearcut logging disrupts the recruitment of large-woody debris, erosion overburdens nearby streambeds, or road-stream crossings cut off important spawning or rearing habitat. Tourists and recreationists don't travel to the Tongass to see and hike through large swaths of clearcut land. They come to take in its scenic beauty and in-tact landscapes. The Forest Service has identified roughly 65 watersheds in need of significant restoration on the Tongass as a result of past logging and road-building activities and estimates it will cost \$100 million to address the backlog of unmet watershed restoration needs.¹¹ Roughly one-in-four jobs in Southeast Alaska are in either the fishing or tourism industries.¹² If the Tongass timber program is to truly support the local and regional economy, it must be designed with the fishing and tourism industries at the forefront and to, in every way possible, avoid and minimize impacts to fish and wildlife habitat.

The past 60 years of industrial logging has targeted the rarest and most productive stands of large-tree old-growth forest, thus reducing the highest-volume contiguous old growth by 66 percent forest-wide.¹³ On Prince of Wales Island, more than 94 percent of the contiguous large-tree old-growth stands have been logged since 1954.¹⁴ This large-tree old-growth forest, which historically covers less than five percent of the Tongass, is among the most valuable habitat for fish and wildlife. The overwhelming weight of the scientific community recognizes the extraordinary value of the remaining big-tree old-growth and has repeatedly called on the Forest Service to speed up the transition and end its old-growth timber sale program.¹⁵

III. Objections to the draft ROD and FEIS for the POW LLA:

TU very much appreciates the thoughtful consideration, time and effort that has gone into the POW LLA. Numerous components of the draft ROD are particularly noteworthy as positive steps toward more a more sustainable forest products industry. Some of the more noteworthy of these positive components include: (1) the decision to not conduct commercial harvest of old-growth timber in stands north of the 20 road or in VCU 5280; (2) the expression of allowable old-growth timber volume as an

¹¹ USDA, *Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013*, R10-MB-734 at 11 (Nov. 2011).

¹² See Rain Coast Data, at 4.

¹³ Albert, D. M., and J. W. Schoen, *A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest* In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. eds J. W. Schoen, and E. Dovichin. Audubon Alaska and The Nature Conservancy (2007), available at <https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

¹⁴ *Id.*

¹⁵ See Jack Ward Thomas and Mike Dombeck, Seattle Times Op Ed, Declare harvest of old-growth off-limits and move on (Aug 23, 2003); Letter to the President by 78 North American Scientists (lead signatories were Jack Ward Thomas and Mike Dombeck) calling for a national old growth policy to protect the remaining old growth on national forest lands throughout the US (June 25, 2014); Letter to Secretary Vilsack from 200+ North American Scientists urging a quick transition out of old-growth logging on the Tongass National Forest (October 15, 2014); Joint Society letter to Secretary Vilsack from American Fisheries Society (AK Chapter), American Ornithologist's Union, American Society of Mammalogists, Ecological Society of America, Pacific Seabird Group, Society for Conservation Biology, The Wildlife Society (January 20, 2015).

average annual volume in 5-year increments;¹⁶ (3) the attention to small-scale timber sales; (4) the focus on deer habitat in managed stands within 5 miles of communities; and (5) providing for instream restoration activities and sustainable recreation.¹⁷ TU supports each of these components of the draft ROD and notes them here for their novel approach compared to past timber sales on the Tongass.

While the POW LLA includes various positive components, TU also maintains various objections to the project, as identified and discussed below. TU raised each of these objections at each earlier stage of the planning process.

a. The Forest Service Failed to Provide Adequate Opportunity for Public Input.

The draft ROD, if implemented, will have significant negative impacts to the region's important fish and wildlife habitat and to the local economy. Harvesting another more than 200 mmbf of old-growth timber from Prince of Wales Island risks disastrous and long-lasting impacts to important fish, wildlife and water resources. These risks and impacts compound when the historic impacts of logging and road building are taken into account, which strongly suggests the need for more appropriately scaled timber sales designed for small operators, strict implementation of standards and guidelines, adherence to best management practices, as well as continual and rigorous monitoring of associated impacts to aquatic, wildlife and recreational resources. Timber harvest in areas with high fish values that currently provide significant private or commercial recreation opportunities or utility as wildlife corridors should be avoided entirely.

While there are many reasons to transition rapidly away from large-scale old-growth logging and numerous concerns about logging and road construction, the POW LLA is especially concerning due to the Forest Service's failure to timber sale unit cards or other detailed information about where, specifically, logging may occur in the future. Unit cards with detailed information about how and where future logging may occur are essential for informed decision making and required for a thorough review of potential impacts. Without unit cards or detailed information about where and how logging will occur, it is impossible for the public to be informed of the details of the project and there is no way for meaningful public participation. Site-specific planning and environmental review is essential to ensure public concerns and potential adverse impacts are addressed and avoided. Because the FEIS and draft ROD fail to include sufficient detail for informed public participation, and by all indication there will be no future opportunity for public input based on more detailed timber sale planning, the POW LLA it is arbitrary and capricious in violation of the National Environmental Policy Act (NEPA).

b. The Forest Service Failed to take a hard look at Direct, Indirect and Cumulative Impacts.

Along with failing to provide the public adequate opportunity to provide comment and input into the planning process, the Forest Service's failure to identify specific timber sale units has made it impossible for the Forest Service to take the requisite hard look at direct, indirect and cumulative impacts from logging and road building activities proposed in the POW LLA. The Forest Service has not

¹⁶ While TU does not support the volumes of old-growth timber planned as part of the POW LLA, we appreciate that the Forest Service will provide that volume as annual average volumes in 5-year increments. We are hopeful this approach will help avoid one of the major pitfalls of past timber sales, where the full volume is logged at a pace and scale much faster and larger than intended.

¹⁷ Draft Rod at 2-4.

identified specifically where logging and road building will occur, and as a result cannot have undertaken a thorough review of reasonably foreseeable impacts.

c. The Forest Service needs to Undertake a Study to Determine the Likely Impacts of Young-Growth Logging in High-Value Fish Watersheds Before Planning Timber Harvesting or Road Building Activities in those Areas.

The FEIS and draft ROD note that, in keeping with the 2016 Amendment to the Tongass Land Management Plan, old-growth logging will not occur in Tongass 77 areas and in TNC/Audubon Conservation Priority Areas. We are very pleased to see this language and the on-going commitment by the Forest Service to the long-term conservation of these important areas. Protecting these high-value areas is a key component of the recommendations unanimously adopted by the Tongass Advisory Committee (TAC) and an issue with broad support from individuals and businesses throughout the region.

The FEIS and draft ROD also notes that some young-growth harvest is planned in Sweetwater Lake (VCU 5730), which is part of the Tongass 77 and a TNC/Audubon Conservation Priority Area. Although the proposed young-growth harvest covers a relatively small area, this will be the first entry for young-growth harvest in the Tongass 77 since the TAC recommendations or the 2016 Amendment. As included by the TAC in its final recommendations, the Forest Service should:

Identify where young growth timber projects, during the period of the transition, intersect with certain high-value fish watersheds. In these areas of intersection, conduct a timely scientific review to determine likely impacts to fish and wildlife habitat from timber harvest. If harvest is proposed in one of these watersheds, the Forest Service may apply additional standards or guidelines to mitigate risk to fish habitat.¹⁸

The TAC specifically identified “Sweetwater Lake VCU 5730” as a “High-Value Fish Watershed” in its final recommendations.¹⁹

To be consistent with the TAC recommendations and the 2016 Amendment, the Forest Service should undertake a thorough scientific review, beyond what is required by NEPA, to improve our understanding of how young growth harvest will impact fish and wildlife habitat before planning young-growth harvest in Sweetwater Lake. Based on the improved understanding gained through this additional scientific review, the Forest Service should then develop and adopt more stringent standards and guidelines for Tongass 77 areas that avoid and mitigate impacts to fish habitat. Among other issues that may be identified by Forest Service staff, new standards and guidelines should be developed to avoid and minimize road impacts, sedimentation and soil stability, large-woody debris recruitment, stream channelization and bank stability, and direct and indirect impacts to fish species across their life stages. Young growth harvest should only be planned within the Tongass 77 *after* the scientific review and adoption of new standards and guidelines so we can take advantage of the present opportunity to improve our understanding of how young-growth harvest can impact fish and fish habitat while

¹⁸ Tongass Advisory Committee, *Tongass Advisory Committee Final Recommendations* at 4 (Dec. 2015), available at http://www.merid.org/~media/Files/Projects/tongass/December%202015%20Meeting/Tongass%20Advisory%20Committee%20Final%20Recommendations_Dec%202015.pdf.

¹⁹ *Id.* at 37.

protecting the high-value fish watersheds that are so important to Southeast Alaska. The Forest Service has provided no rationale or basis for its decision to disregard the TAC's recommendation and to move forward now with young-growth timber sales in Sweetwater Lake.

d. The Forest Service Should Prioritize Riparian and In-stream Restoration.

A large portion of Prince of Wales Island has been unsustainably roaded and logged over the past several decades. These activities have had serious adverse effects on many streams, rivers, lakes and riparian areas, and on the fish and wildlife that use these areas. Road densities are too high, deer population densities are too low, large woody debris is not being recruited at a level necessary to ensure continued productivity of important salmon streams, and many areas suffer from regular landslides and unnatural slope instability. Addressing these impacts should be the top priority for the Forest Service on Prince of Wales Island to ensure valuable fish, wildlife and water resources are productive and can continue providing important benefits to local users and visitors. In particular, the Staney, Shaheen, Ratz, Flicker/Buster, Hatchery and 108 watersheds appear in need of significant restoration.

While TU strongly supports riparian and in-stream restoration projects as part of the POW LLA, the Forest Service should focus its efforts on activities that are designed to return impacted fish and wildlife habitat to its natural or historic condition. Some of the projects and activities identified as restoration in the FEIS and draft ROD, such as lake fertilization and barrier modification, are not restorative and should be evaluated and considered separately from restoration activities designed to return fish and wildlife habitat to its natural condition. These non-restorative activities are designed to alter the natural condition of the habitat, and can have significant effects on natural food webs, stream function, and species composition. These activities can also temporarily mask the effects of other significant stressors to fish and wildlife habitat and delay more appropriate actions that are necessary to address the root causes of fish or wildlife population declines.

e. The Forest Service Should Address the Backlog of Road Maintenance Needs and Consider Alternatives that Avoid new Road Construction or Reconstruction.

TU encourages the Forest Service to avoid new development activities that will impact salmon streams or cause them to exceed environmental thresholds identified in the Forest Plan. Multiple subwatersheds within the project area already exceed standards identified in the Forest Plan for the amount of harvest area and the amount of roaded area. Additional subwatersheds have been identified as having a high potential for sediment impacts to aquatic resources. The USFS should avoid any new logging activities that will cause or exacerbate exceedances of the 20% standard. It also should avoid any road construction or reconstruction if the activity will increase or cause new exceedances of the 2.5% standard.

Although the activity cards associated with Fish Passage appear to indicate that all new culverts and stream crossings constructed under this plan will provide both upstream and downstream passage for fishes at all life stages and at all stream flow levels, the Forest Service should commit to addressing each of the already-existing fish passage issues in the project area before constructing or reconstructing new roads. As the FEIS states, "[t]he 447 Red crossings in the project area are inhibiting access to approximately 29,000 meters (18 miles) of Class I upstream habitat, and 114,000 meters (71 miles) of Class II upstream habitat."²⁰ Simply avoiding new impediments to migration is insufficient. The Forest

²⁰ FEIS at 137.

Service should also remove, replace or repair all the existing red pipes and conduct an inventory to seek out additional, not-yet-discovered red pipes. The fact that these issues persist and will be compounded by new road construction activities under the FEIS and draft ROD without any meaningful plan to address the significant backlog of road maintenance and restoration needs is unacceptable. The lack of justification for this decision is arbitrary.

In addition to fish passage issues associated with stream crossings, logging roads can have serious negative impacts on important fish and wildlife habitat even where the roads do not intersect streams. Sedimentation, landslides, and increased traffic are just some of the potential impacts of logging roads—along with the significant and long-term costs to taxpayers of road construction and maintenance. Given that the various action alternatives have very little difference in how much new road construction would occur within 300 feet of fish habitat—ranging from a low of 118 miles for Alternative 5 to 122 miles for Alternatives 2 and 3²¹—the range of alternatives is inadequate. The Forest Service should have developed a new alternative that includes significantly reduced road construction. Because of the serious negative impacts of roads and the extremely high cost to the tax-paying public, alternative means for harvest should have been considered that do not rely on new logging roads.

f. The Forest Service should Prioritize Recreation Infrastructure.

TU applauds the Forest Service and POW LAT for identifying and considering the various recreation projects evaluated in the DEIS. Improving trails, shelters, cabins, and other recreation facilities will benefit locals and visitors alike, and will help increase revenue generated from the Island's tourism economy. We encourage the Forest Service to fully implement these projects.

IV. Conclusion.

When evaluating the benefits from forest lands to society, the Forest Service is placing far too much emphasis on traditional extractive resources while largely ignoring benefits from fish, wildlife, recreation and water resources. As discussed above, by far the most valuable activities occurring on the Tongass are derived from intact fish and wildlife habitat and wild scenery. This is true throughout the National Forest System, but is especially relevant in Southeast Alaska where the Tongass comprises such a large portion of the land base. Southeast Alaska's timber industry pales in comparison to the region's fishing and tourism industries. Maximizing the benefits from the Tongass to the public requires the Forest Service to manage the Tongass in a way that prioritizes its contributions in fish, wildlife and visitor services.

Rather than planning additional over-sized and costly timber sales that are unsustainable and detrimental to the long-term resiliency of Prince of Wales Island, the Forest Service should take this opportunity to diversify its timber program and offer a set of appropriately-scaled timber sales that sustainably manages timber lands, encourages new investment in technologies that will transition the forest products industry, and avoids highly-subsidized and unsustainable logging practices. Stewardship contracts should be avoided altogether except for where the underlying purpose of the contract is to improve ecological health and where timber harvest, if occurring at all, is only a very minor part of the on-the-ground activity and secondary to the ecological goals of the contract. As proposed by the draft ROD, it would be inappropriate for the Forest Service to use stewardship contracts to implement the

²¹ See *id.* at 41.

POW LLA. Restoration of riparian and in-stream habitat, including activities to remedy fish passage past red pipes, should be a top priority and not contingent upon nearby timber harvest.

Thank you for the opportunity to provide input into this planning process. Please do not hesitate to contact me by email at awilliams@tu.org or by phone at 907.227.1590 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Austin Williams', written over a horizontal line.

Austin Williams
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