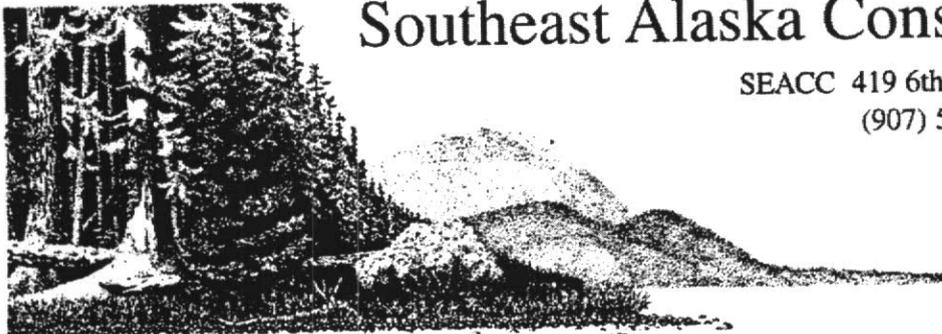


# Southeast Alaska Conservation Council

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November 19, 2007

**via email to: [comments-alaska-tongass-hoonah@fs.fed.us](mailto:comments-alaska-tongass-hoonah@fs.fed.us)**

Hans von Rekowski  
 IDT Leader  
 Sitka Ranger District  
 204 Siginaka Way  
 Sitka, AK 99835

**Re: Comments on the Draft Environmental Impact Statement for the Iyoutug Timber Sales**

Dear Mr. von Rekowski:

The Southeast Alaska Conservation Council (SEACC) submits the following comments on the Draft Environmental Impact Statement (DEIS) published for public comment by the Forest Service on the proposed Iyoutug Timber Sales. The DEIS describes the no-action alternative and four action alternatives. The action alternatives propose logging between 16.8 million board feet (MMBF) of timber from 883 acres and 59.8 MMBF from 4,185 acres from the project area on Northeast Chichagof Island.

SEACC is a coalition of 15 volunteer citizen organizations based in 13 Southeast Alaskan communities. SEACC's membership includes commercial fishermen, Alaska Natives, small-scale timber operators and value-added wood product manufacturers, tourism and recreation business owners, hunters and guides, and Alaskans from many other walks of life. SEACC is dedicated to preserving the integrity of Southeast Alaska's unsurpassed natural environment while providing for the balanced, sustainable use of our region's resources. Even after years of industrial scale logging on public and private lands in Southeast Alaska, the region continues to possess magnificent old-growth forests, outstanding fish and wildlife habitat, vital customary and traditional use and subsistence areas, and excellent air and water quality. Southeast Alaska's rugged, wild landscape allows Alaskans to pursue a lifestyle no longer available to most Americans.

**I. Cumulative impacts of past and planned logging on adjacent, private lands**

SEACC-1

The 9th Circuit court decision that resulted in the revision of the 1997 Tongass Land Management Plan stated the Forest Service did not consider the cumulative impacts of past and reasonably foreseeable future non-federal logging in high volume old growth

ALASKA SOCIETY OF AMERICAN FOREST DWELLERS, Point Baker • CHICHAGOF CONSERVATION COUNCIL, Tenakee • CUSTOMARY & TRADITIONAL GATHERING COUNCIL OF KAKE • FRIENDS OF BERNERS BAY, Juneau • FRIENDS OF GLACIER BAY, Gustavus • JUNEAU AUDUBON SOCIETY • LOWER CHATHAM CONSERVATION SOCIETY, Port Alexander • LYNN CANAL CONSERVATION, Haines • NARROWS CONSERVATION COALITION, Petersburg • LISIANSKI INLET RESOURCE COUNCIL, Pelican • PRINCE OF WALES CONSERVATION LEAGUE, Craig • SITKA CONSERVATION SOCIETY • TAKU CONSERVATION SOCIETY, Juneau • WRANGELL RESOURCE COUNCIL • YAKUTAT RESOURCE CONSERVATION COUNCIL

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SEACC-1  
(cont.)

forest of the Tongass, in violation of NEPA. We do not believe the Draft EIS for the Tongass Land Management Plan Adjustment (2007) adequately addressed this court-mandated issue; neither does the Iyouktug DEIS. Of the 5,050 acres in the project area, approximately 3,000 acres were clearcut in the past 20 years under the Alaska Pulp Corporation long-term contract. The project area also includes 265 acres of privately-owned lands – of which 175 acres have been clearcut. DEIS at Table D-1. Immediately adjacent to, but outside of, the project area, thousands of acres of forest have been clearcut in the Spasski watershed. The project analysis must evaluate the cumulative effects of this project on the human environment, including the cumulative impact of extensive logging on public and private lands.

SEACC-2

The DEIS states that “[t]he project area is bordered on the northwest by private land, much of which has been previously harvested. (See DEIS at Figure 2-1). This area is not part of the project area. Depending on the resource, activities in these private lands have been considered in cumulative effects. (Resource Specialist Reports, Iyouktug Project Record).” DEIS at 1-2. The discussion of cumulative impacts from past logging on adjacent private lands is limited to the following from the DEIS: “[e]xtensive timber harvest has taken place in the Spasski Watershed, a high-value sport fishery and primary salmon producer in the project area. This harvest is on private land and has had unquantified but probable adverse effects to water quality and fish habitat due to extensive riparian harvest and landslide initiation. Because the boundary is outside project area watersheds, there is no cumulative effect to project area fish or water quality due to adjacent harvest.” DEIS at 3-163. Doesn’t the Alaska Departments of Natural Resources and Environmental Conservation have any information related to this timber development? Didn’t the Forest Service have any data related to this watershed before it was conveyed to Huna Totem? Why can’t the Forest Service compare that data with the watershed’s existing condition, which is easily discernable from review of photographs or aerial overflight? In particular, how can effects be dismissed if they are “unquantified” and therefore, unknown? We believe this information is essential for the Forest Service to evaluate reasonably foreseeable significant adverse impacts, particularly cumulative impacts, and make a reasoned choice among alternatives. We do not believe the overall cost of obtaining this information is exorbitant, and the DEIS fails to explain why the Forest Service hasn’t collected this information, evaluated the relevance of the data for assessing cumulative effects, summarized existing credible scientific information, or conducted any meaningful evaluation. Consequently, this information should be disclosed in the DEIS. 40 C.F.R. § 1502.22(a). By concluding that there are no cumulative effects because logging happened “outside project area watersheds,” the agency fails to take a hard look at cumulative impacts. By excluding the thousands of acres of clearcuts on private lands adjacent to the project area and within the customary and traditional territory of the Hoonah Tlingit, the agency fails to provide adequate information about the impacts of past and proposed logging within and adjacent to the project area on wildlife, fisheries, and human uses of these important resources. / Given the importance of data related to adverse effects

SEACC-3

from intensive timber development on adjacent private lands, and the lack of that information in the DEIS, we recommend the Forest Service issue a supplemental DEIS for public review. The missing information is very relevant to environmental concerns and bears directly on the cumulative effects of the proposed action when considered with

SEACC-3  
(cont.) | other past, present, and future actions on private lands adjacent to the project area. *See* 40 C.F.R. § 1502.9(c)(1)(ii). A supplemental DEIS would also further the purposes of NEPA by insuring that agency decision-makers and the public have available high quality, accurate environmental information to review anticipated effects of the proposed action *before* decision are made. *See* 40 C.F.R. § 1500.1(b).

SEACC-4 | To our knowledge, no landscape-level analysis has been performed for the Northeast Chichagof area. Given the level of past logging activities, we urge the Forest Service to consider doing such analysis and incorporating it into this project planning process before proceeding any further with this project. SEACC is in the process of taking a longer-term look at past and future uses of the Northeast Chichagof landscape with our neighbors in Hoonah and would appreciate the opportunity to collaborate with the Forest Service and other interested parties on such a landscape analysis.

SEACC-5 | Compensating for past and planned logging on adjacent lands could include modifying the small Old Growth Reserve boundaries and adjusting plans for precommercial thinning in the project area. We urge the agency to consider and incorporate these opportunities into this project planning process.

**II. Volume and sale size**

**A. Various small sales would meet local demand**

SEACC-6 | The local demand for timber, the heavy fragmentation of the landscape, and resulting decline in the deer population indicate that the volume being considered in the preferred alternative is excessive and unreasonable. The Draft EIS for the Tongass Land Management Plan Adjustment (2007) reports Icy Straits Lumber usage in 2004 and 2005 at 550 MBF and 500 MBF, respectively. *See* TLMP DEIS at 3-418, Table 3.22-5. This is lower than the reported use and demand in the Iyouktug DEIS. DEIS at 3-37.

SEACC-7 | The preferred alternative would result in timber sold through various small sales (“less than 3 MMBF/yr”), and *one or more larger sales*. DEIS at 2-10. As we stated in our scoping comments, SEACC is willing to work with local operators, the Hoonah Ranger District, the Hoonah Indian Association, and other concerned parties to develop a timber sale program that meets the current needs of local operators, without sacrificing important or rare habitat that is critical for wildlife, and customary and traditional uses within the project area. We believe this balance would be best achieved through truly small sales, *not one or more larger sales*. Of the action alternatives, only Alternative 5 offers truly small sales over a period of time. Such a sale program would help provide wood to Icy Straits and other local wood manufactures, minimize impacts to customary and traditional use of deer, and best assure balanced, sustainable multiple use of all renewable forest resources in the project area.

**B. The preferred alternative does not best meet Purpose and Need or adequately address Significant Issues**

SEACC-8

The DEIS states that “[a]lternative 3 was developed to minimize impacts to deer habitat and connectivity while providing for an economic timber supply.” DEIS at Summary vi. The document then states: “[a]lthough not reflected in the habitat capability results, Alternative 3 was designed to clearcut fewer acres and to maintain more connectivity and low elevation habitat for deer.” DEIS at 3-86.

SEACC-9

It is confusing that the DEIS refers to this alternative as minimizing impacts to deer habitat and connectivity, but is unable to measure this adequately in the analysis provided. Alternative 5, on the other hand, is designed to maximize the economic return of timber harvest and has the least impact on prime deer winter habitat of all the alternatives. It appears that Alternative 5 better meets the purpose and need of the project and, among the action alternatives considered, best accommodates two of the three significant issues raised.

**III. DEIS does not meet statutory requirements for subsistence**

SEACC-10

There is no question that deer hunting is a major activity in the Hoonah area. Among communities in Southeast Alaska, Hoonah ranks first among communities in per capita subsistence harvest at over 500 pounds of subsistence foods per capita per year. (See TLMP DEIS at Figure 3.17-2) Easily accessible from Hoonah, the project area is heavily used for deer hunting, with “residents from Hoonah, Haines and Juneau communities obtain[ing] approximately 75 percent of their average annual deer harvest from WAA 3551.” DEIS at 3-128. Given the importance of deer hunting, we are deeply concerned by the prediction of a decline the deer population. See DEIS at 3-21.

SEACC-11

During the Tongass Forest Plan revision process, Hoonah residents submitted a resolution that urged the Forest Service to “ensure that fish and wildlife and other resources never and nowhere reach a point where continued levels of harvest would jeopardize stock to unsustainable levels and result in use-priority restrictions.” (See attachment: Multi-Users Voice Resolution; a copy of this resolution containing signatures is on file with the Forest Service.)

SEACC-12

The Draft EIS states: “[c]urrent deer demand is approaching a level at which not all hunters may be successful.... Following a severe snow winter, demand for deer might not be met. In areas where hunter demand exceeds 20 percent of habitat capability, harvest of deer by hunters may be restricted directly through restrictions in seasons and harvest limits.” DEIS at 3-129. Hunter demand is currently 227 deer, representing 14.3 percent of habitat capability (based on HSI model). DEIS at 3-131. Already, this has exceeded the 10 percent carrying capacity threshold for deer. DEIS at 1-19.

SEACC-13

Unfortunately, it appears that the area has already reached the point where hunting restrictions are necessary. On November 6, 2007, the Alaska Department of Fish and Game issued an emergency closure of doe hunting in Game Management Unit 4, citing

SEACC-13 | substantial winter-related deer mortality. “Additional doe harvest beyond this closure date is excessive and may jeopardize the future productivity of the herd.” (See attachment: ADF&G Emergency Order No. 01-06-07 (November 6, 2007))

SEACC-14 | ANILCA requires the Forest Service to make certain determinations when a significant possibility of a significant restriction in subsistence uses will occur. We do not believe the analysis in the DEIS adequately meets the statutory requirements to minimize adverse impacts to subsistence uses and resources.

SEACC-15 | **IV. Decline in deer population raises questions about landscape capability**

Faced with the prediction that deer population will decline as a result of past, proposed, and future harvests, and recent actions by ADF&G to close doe hunting this season in the Hoonah area, questions are raised about the capability of the landscape to withstand proposed and future harvests. The low elevation, high volume POG that is important winter deer habitat is precisely the kind of habitat that has been logged in the past in the Iyoutug area. DEIS at 3-80 and 3-82. Nevertheless, the action alternatives considered propose logging from 0.9 MMBF to 3.1 MMBF of this habitat type. DEIS at Table 3MI-10.

SEACC-16 | We have serious reservations about the impact of any further reduction in high quality deer habitat. Following on the heels of the severe 2006 winter, efforts to understand the condition of available deer habitat and the impacts of further removal of critical deer winter habitat should go beyond the analysis contained in the DEIS and include active steps to restore and rehabilitate areas of former critical deer winter habitat.

SEACC-17 | In particular, we urge the planning team to incorporate further alternative models to improve its analysis and the public’s understanding of impacts to deer habitat capability. The DEIS relies on the deer habitat capability model to determine an estimate of the potential supply of deer available for subsistence use. DEIS at 3-80. NEPA requires the Forest Service disclose any shortcomings of the model used and also consider other reasonable analysis based on a corrected interpretation of the model. The shortcomings of the model are not discussed in the DEIS.

As discussed in our appeal of the Emerald Bay Timber Sale filed with the Forest Service on January 5, 2006, the agency’s use of the deer model has been seriously flawed for a variety of reasons. See SEACC, et al. Appeal of Record of Decision for the Emerald Bay Timber Sale, at 49-55. For example, the Forest Service applied an incorrect deer carrying capacity multiplier of 100 deer/sq. mile in an area with a Habitat Suitability Index of 1.0; this is the same multiplier used in Iyoutug DEIS. See DEIS at 3-81.

An additional flaw in the model used is that “high value deer winter habitat” refers to the top quartile of acres in the Habitat Suitability Index, or an HSI value of 0.42-1.0. This artificially inflates the number of acres considered “high value.”

SEACC-18 | We strongly support the planning team’s use of predictors other than HSI model. “Prime habitat,” defined as “HPOG (high volume strata) on south and west facing aspects below

SEACC-18  
(cont.) | 800 feet in elevation” is a more realistic measure of truly “high value” habitat. DEIS at 3-81. Given that only 53 percent (1,703 acres) of prime habitat remains in the project area, we strongly encourage the planning team to remove any units that include prime winter habitat. DEIS at 3-82. Because of the shortcomings of the HSI model, the Forest Service should include a map that shows “prime” winter habitat in addition to the map showing high value deer habitat.

SEACC-19 | We support the use of Quick-Cruise plots to assess the quality of deer winter habitat. On face value, an average plot score of 64 out of 100 seems low. DEIS at 3-82. However, the information available in the DEIS is insufficient for evaluating the relative value of deer habitat within the unit pool of the project area. Where were the plots located? Only in the unit pool? Outside of the unit pool? How does the unit pool compare with areas outside the unit pool? Answers to these kinds of questions are available in the planning record, but not the DEIS.

**V. Further steps needed to minimize impacts to subsistence deer hunting and improve habitat connectivity**

SEACC-20 | The larger landscape of Northeast Chichagof, including the Iyouktug project area, is highly fragmented both by previous logging and high elevation ridge lines. Due to this fragmentation, a concerted effort is needed to maintain viable wildlife connectivity. We appreciate that overall landscape connectivity was considered early on in the planning process.

SEACC-21 | Aside from a landscape-level analysis, one area where analysis and compensation for cumulative impacts on adjacent private lands could occur is in the modification of the small Old Growth Reserves.

SEACC-22 | Another area where cumulative impacts from adjacent private lands could be considered is in future plans to thin young growth in the project area and surrounding lands. The DEIS indicates that “site-specific prescriptions would be developed prior to implementation to guide these future treatments in previously harvested areas.” DEIS at 3-116. Table D-1 indicates that between 2007 and 2015, 2,000 acres will be precommercially thinned in the project area and 1,000 acres will be precommercially thinned in the Suntaheen Valley and Whitestone Harbor. If any additional old-growth timber is to be logged from this landscape, it should be linked with habitat restoration-oriented thinning to minimize adverse impacts to subsistence uses and resources.

SEACC-23 | We appreciate the effort to include a discussion of wildlife corridors and connectivity, and the time and resources dedicated to identifying corridors. In particular, we appreciate that the DEIS recognizes two kinds of connectivity – landscape connectivity and elevational migration connectivity. DEIS at 3-7. With the project area facing a “significant possibility of a significant restriction in subsistence deer resources and uses” (DEIS at 3-131) and the Forest Service’s duty to minimize adverse impacts to subsistence uses and resources, we believe an even more concerted effort is needed.

SEACC-23  
(cont.)

The area around the North Fork of Iyouktug creek was identified in the DEIS as a wild-life travel corridor. In addition, it appears to be among the few southwest-facing slopes with productive old growth in the project area (and therefore valuable winter deer habitat). We strongly urge the Forest Service to remove Units 116, 117, and 118 from the unit pool and not build the associated road, NFS road 853431. We are also concerned

SEACC-24

that the likelihood of blowdown in proposed helicopter units in this vicinity (125, 185, 184) will result in de-facto clearcuts, which would certainly impede connectivity, and that units proposed for clearcuts will further fragment this already fragmented area.

SEACC-25

Units 818 and 919 are identified as having the greatest impact to elevational connectivity. DEIS at 3-18. We urge the Forest Service to remove these units from the unit pool. For reasons of connectivity, as well as for the value of the habitat for deer winter use, we urge you to remove Unit 914 from the unit pool.

We also support Bob Christensen's comments and information provided on this subject.

**VI. Results of partial cutting in wind-prone areas are unknown**

SEACC-26

Three types of trees in Southeast have been identified as predisposed to wind damage: 1) old trees with higher limb & leaf-to-root ratio; 2) shallow-rooted trees on wet soils; and 3) stilt-rooted trees.<sup>1</sup> During the course of a field visit to the Hoonah area this fall, we observed these factors in the Iyouktug area in general and in Unit 103 in particular. The range of action alternatives proposes the following partial cut prescriptions in areas identified as having moderate to high wind risk: 50 percent removal in 202 to 315 acres, 40 percent removal in 794 to 1,714 acres, and 25 percent removal in 0 to 903 acres. DEIS at Table S-1.

While we agree that logging makes more sense in wind-generated stands, or windforests, than in other productive forest types, we have serious concerns about partial-cut prescriptions in areas of moderate to high wind risk. Clearcutting, in essence, mimics the natural effect of windthrow. Partial cutting may weaken the stand's resilience to wind events. Does the Reasonable Assurance of Windfirmness (RAW) analysis take into account the affect of partial cutting in determining wind risk? Does RAW analysis consider soil condition or site-specific productivity? Are there examples of areas in the Tongass with moderate to high wind risk that have been partially cut?

SEACC-27

Based on the information provided in the Draft EIS, a decision that would result in partial cuts ranging from 176 acres in Alternative 5 to 1,633 acres in Alternative 2 in areas with moderate to high wind risk would be highly experimental. Not knowing what results to expect from partial cuts in moderate to high wind risk areas calls into question the assertion that the reduction in prime deer habitat is overestimated. See DEIS at 3-82. If, in

<sup>1</sup> Harris, A.S. 1989. *Wind in the Forests of Southeast Alaska and Guides for Reducing Damage*. Gen Tech Rep. PNW-GTR-244. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.

SEACC-27 | fact, partial cuts in wind-prone areas are more likely to result in blowdown, then the im-  
(cont.) | pact on habitat is virtually the same as clearcutting.

## VII. Yellow Cedar

### A. Analysis of stand composition is flawed

SEACC-28 | In our scoping comments, we asked that the Forest Service fully disclose and evaluate  
| how much logging is proposed for cedar stands in this project. More information needs  
SEACC-29 | to be provided for the public to understand where and how much cedar is present in the  
| project area. / What is the representation of cedar outside of the unit pools, but within the  
| project area?

### B. Success of proposed measures to maintain yellow cedar is unknown

SEACC-30 | We are concerned by the statement in the DEIS: “[y]ellow-cedar decline is not prevalent  
| in the Iyoutug project area. The Forest Service intends to maintain cedar in the Iyout-  
| tug landscape.” DEIS at 1-16. Since the ecological role and value of yellow cedar stands  
| are largely unstudied and since a half-million acres of yellow cedar is in decline in the  
| Tongass, this response appears dismissive and not based on a scientific understanding of  
| cedar regeneration.

SEACC-31 | If the general guidelines for single tree selection call for designating “up to specified per-  
| cent of the existing basal area for harvest emphasizing spruce 24 inches DBH or greater  
| and yellow-cedar” (DEIS Appendix B at 4), please explain how a representative mix of  
| species remains if cedar is being particularly designated for single-tree selection?

SEACC-32 | We have a number of questions about the proposed measures for maintaining yellow ce-  
| dar in the project. See DEIS at 2-14. While these measures may *reduce* the impact of  
| disproportionate logging of yellow cedar, does research support that leave trees will stay  
| upright in wind prone areas (see Section VI)? Or that regenerating cedar in stands where  
| it would be harvested will be successful?

SEACC-33 | The DEIS anticipates that “natural regeneration is expected to be abundant and include  
| the same species mix as the original stand.” DEIS at 3-111. Later, the DEIS adds that  
| “[i]nter-planting of yellow-cedar or spruce should be scheduled if necessary to increase  
| post-harvest composition or maintain pre-harvest composition of these species.” DEIS  
| Appendix B, at B-5. What monitoring data does the Forest Service have to support a con-  
| clusion that such a strategy will be effective? What research is behind the regeneration  
| rate of cedar in partially cut stands where less light is available? Any data that the Forest  
| Service has must be disclosed for public review and comment. Should the agency suc-  
| ceed in regenerating yellow cedar, it is a slow-growing species in comparison to western  
| hemlock or Sitka spruce. / Will the stand rotation be modified to reflect that 100 or 150-  
SEACC-34 | year rotation may not be sufficient to grow back yellow cedar?

SEACC-35

**VIII. Impact of "limited interstate commerce" on Alaskan jobs**

SEACC has a long history of support for getting the most jobs per board feet cut on the Tongass and opposition to the export of unprocessed logs from the Tongass. Seeing the Forest Service's projections of jobs lost due to the new "limited interstate commerce" policy underlines why SEACC is opposed to this policy. Given the new policy that allows the loss of up to half of the potential local jobs associated with this project, what assurance do we have that the volume cut in this sale will actually support local jobs?

SEACC-36

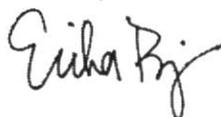
**IX. An integrated, collaborate management approach**

In closing, for future proposed activities in the Northeast Chichagof area, and in this proposed action if possible, we hope to be able to work collaboratively with the Forest Service and other interested parties. Through the Tongass Futures Roundtable, a diverse group of stakeholders has come together to work through a proposed timber sale on Wrangell Island. On the Thorne Bay district, conservation groups and district employees are working collaboratively on stream restoration projects. We think the time is ripe to begin genuinely practicing the collaborative stewardship process directed in the 1997 TLMP Record of Decision (ROD): "[f]orest supervisors and District Rangers to increase their efforts in collaborative stewardship within the communities of Southeast Alaska. Collaborative stewardship means bringing people together to share in the decision making in implementing Forest Plan direction." TLMP ROD (1997) at 42.

We welcome the opportunity to pursue collaborative management on this and future projects in the Hoonah Ranger District.

Thank you for your consideration of these comments and the extensive fieldwork and planning efforts that contributed to this document.

Sincerely,



Erika Bjorum  
Grassroots Organizer

**Responses to SEACC – Erika Bjorum, Southeast Alaska Conservation Council**

**SEACC-1** – Please see responses to SCS-5 and BC-25.

**SEACC-2** – Please see response to BC-25. Since none of the proposed harvest units or other timber sale activities affect or would have any influence on the Spasski watershed, or have an affect on the sport fishery in the Spasski drainage, cumulative impacts would be minimal to non-existent on this resource with activities occurring in the Iyouktug drainage. With regards to fisheries, even if the previous timber harvesting in the Spasski drainage affected this resource, activities in Iyouktug would have no influence on the Spasski watershed. Forest Plan Standards and guidelines will be adhered to in Iyouktug with regards to fisheries and watershed resources and will not adversely affect the watershed or fisheries resource.

**SEACC-3** - Please see responses to BC-25 and SEACC-2. Since cumulative effects were analyzed, no supplemental EIS is necessary.

**SEACC-4** – While landscape analyses are desirable and valuable resources in timber sale and other project planning, they are not required. Please also see responses to BC-25 and SEACC-45. Please keep the Hoonah District Ranger informed of the progress on your Northeast Chichagof analysis.

**SEACC-5** – Please see responses to BC-15 and 26 for information on the development of the proposed Old Growth Reserves. The interagency team assessed landscape connectivity when reviewing the location of the small OGRs. Please see response to BC-8 for information on thinning.

**SEACC-6** – Please see responses to BC-3 and JM-5.

**SEACC-7** – Please see responses to BC-4, EH-1, and JM-3.

**SEACC-8** – The DEIS and FEIS Chapters 2 and 3 supports your statement that Alternative 3 was designed to minimize impacts to deer. The DEIS and FEIS, Chapter 3, Habitat Connectivity and Old Growth, Environmental Consequences on Connectivity section states that it is important to not only consider the change in habitat (productive old growth forest) but also the location of the of the habitat being changed. Whereas the reduction of POG habitat is quantifiable, factors including the location, elevation and observed habitat use of a proposed unit were considered in the connectivity analysis but were not easily quantified. As an example, consider the harvest of Units 189 and 819. These units are proposed in all of the action alternatives (including Alternative 5) except for Alternative 3. These units were excluded from Alternative 3 because the highest amount of deer use was observed in Unit 189 and heavily used trails were observed in Unit 819. Although Alternative 3 shows a higher level of reduction in POG forest than Alternative 5, the overall impact to specific areas of quality deer habitat are reduced by dropping these units.

**SEACC-9** – Thank you for your support of Alternative 5. Please see response to SEACC-8 for information on how connectivity was addressed for Alternative 5.

**SEACC-10** – The impacts on deer population are analyzed and reported in the DEIS and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Subsistence section.

**SEACC-11** - Thank you for the information that you provided. This information would have been taken into consideration during the analysis of the Forest Plan Amendment.

**SEACC-12** – Your statement is supported in the DEIS and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Subsistence section. The Subsistence analysis was updated to reflect response to comments (see response to SCS-88 and 89). Although the 10 percent carrying capacity threshold is used as a guide to assess the level of effects, the Forest Plan does not include a threshold for deer carrying capacity.

**SEACC-13** - Please see response to SCS-13 to see how the analysis was updated to reflect the recent doe hunting closures.

**SEACC-14** – This project is consistent with Section 810 (a)(3) of ANILCA.

**SEACC-15** –The DEIS and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Management Indicator Species (MIS) and Other Wildlife, Sitka Black-tailed Deer section address the effects of the proposed project on deer and deer habitat. This analysis was updated to reflect the recent doe hunting closure (see response to SCS-13) and information from response to comments (see response to SCS-88 and 89).

**SEACC-16** – Please see response to BC-5 for information on the range of alternatives designed to address deer habitat and connectivity.

**SEACC-17** – Please see response to SCS-35 for information on the use of the deer model.

**SEACC-18** – We appreciate your support for the other factors considered in the deer analysis and for your recommendation to drop units that occur in prime deer winter habitat. Prime deer winter habitat occurs inside and outside proposed harvest units. Based on the response to comments, a map of prime deer winter habitat was added to the Wildlife and Subsistence Resource Report.

**SEACC-19** – Thank you for your support in using the quick cruise plots. The Wildlife and Subsistence Resource Report, Management Indicator Species (MIS) and Other Wildlife, Sitka Black-tailed Deer section discloses the locations of the quick cruise plots. The map and additional information is not located in the DEIS because this document provides only a summary of the total analysis (see Chapter 1 of the DEIS and FEIS, Availability of the Project Record section).

**SEACC-20** - Your recommendation and support for connectivity as a significant issue has been noted. Population viability is addressed at the Forest level. Please see response to SCS-16 and 35 for information on maintaining population viability.

**SEACC-21** - Please see responses to BC-15, BC-26 and SCS-35 for information on the OGRs.

**SEACC-22** – Please see response to BC-8. Table D-1 displays acres of ongoing and future precommercial thinning. Table D-1 in Appendix D of the FEIS has been updated to clarify acres of precommercial thinning and timeframes.

**SEACC-23** – Thank you for referencing specific units in your comments, your support of analyzing connectivity and for your recommendation to further reduce the effects to connectivity. Please see response to BC-5 for information on the range of alternatives designed to address connectivity. Please see response to BC-9 for information on Units 116, 117, and 118, units in the North Fork of Iyouktug Creek.

**SEACC-24** – Thank you for referencing specific units in your comments. Please see responses to BC-6, BC-9, BC-18, BC-19, BC-20 and BC-21.

**SEACC-25** – Your recommendation to drop Units 818, 819 and 914 to maintain connectivity was noted. Unit 819 was dropped from Alternative 3. Unit 914 was dropped from Alternative 5. Please see response to BC-5 for information on the range of alternatives designed to address deer habitat and connectivity.

**SEACC-26** – The type/morphology of individual trees is important. However, there are several landscape and topographic (abiotic) features such as aspect, elevation, and wind direction that are more important in determining wind risk (Ott 1995, Nowacki and Kramer 1998, Harris 1989). Unit 103 has a moderate to high wind risk, but does not have evidence of catastrophic windthrow as found in other parts of the Iyouktug project area.

Your comment references Table S-1 in the DEIS, however the acres that you reference in your comment are for all wind risk categories not just moderate to high as your comment indicates. Please refer to Table 2-3 for proposed harvest in moderate-high and high wind risk areas. Wind risk rating for each alternative by prescription is located in the Iyouktug Timber Sales Project Record, IY 5f 358.

Please also see responses to BC-6 and BC-18.

RAW zones take into account harvest method, terrain, topography, soils and other resource concerns. The Hanus Bay study site included in the Alternative to Clearcutting (ATC) Study (McClellan 2007) is in an area known as having high wind risk potential. Please see response to BC-6 for more information on how this has been addressed in the DEIS and FEIS and information regarding ATC windthrow monitoring five years post harvest.

**SEACC-27** - Please see response to BC-6 for information on partial harvest. The DEIS (p. 3-82) and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Management Indicator Species (MIS) and Other Wildlife, Affected Environment for Deer, High Value and Prime Deer Winter Habitat section does not support that the reduction in prime habitat was overestimated. However, the Environmental Consequences for Deer section does assume that the effects to habitat capability may be overestimated (see response to SCS-85 for more information). Please see response to BC-6, 10 and 19 for information on how the effects of windthrow were considered.

**SEACC-28** – Please see responses to BC-22 and BC-23.

**SEACC-29** – Yellow-cedar representation within the project area as a whole is estimated based on FIA data (Wilson 2002). Please see FEIS, Chapter 3, Silviculture and Vegetation, Direct and Indirect Effects on Species Composition and Long-term Productivity and the Silviculture Resource report have been updated to clarify this.

**SEACC-30** – Please see response BC-22 and BC-23. Please also see the FEIS Chapter 3, Silviculture and Vegetation, Forest Health and Natural Disturbance, Yellow-cedar decline.

**SEACC-31** - Please see responses to BC-22 and BC-23.

**SEACC-32** - Please see responses to BC-6, BC-22 and BC-23.

**SEACC-33** - Please see responses to BC-22, BC-23, and ISES-2.

**SEACC-34** - Please see responses to BC-22 and BC-23.

**SEACC-35** - As displayed in the DEIS and FEIS, Issue #3 (Timber Economics), under Environmental Consequences on Timber Economics, Projected Employment and Income, not all jobs are considered to be affected by the interstate shipping. If the maximum volume permitted under the interstate shipping policy was shipped out of Alaska, one-half of the sawmill jobs would occur out of state; logging jobs would not be affected by interstate shipping.

Allowing limited interstate shipments will allow timber to be appraised using higher lower 48 market values. That would substantially improve the likelihood that timber will achieve a positive appraisal, and continue to be offered for sale from the Tongass. Unless the Tongass can offer a reliable supply of timber with a positive appraisal, the few remaining locally owned mills in Southeast Alaska will find it very difficult to stay in business. Closure of the remaining mills, even on a temporary basis, would run counter to the objective of supporting local jobs, economies, and wood processing capacity in Southeast Alaska. Please also see response to comment JM-4.

**SEACC-36** - District Rangers held two meetings and one field visit with local interest groups on the Iyouktug project (DEIS and FEIS, Chapter 1, Public Involvement). The site-specific comments and questions that came out of these meetings were helpful in developing alternatives and design measures for this project and in clarifying the analysis. There are several venues for public involvement in project and forest planning including the Tongass Futures Roundtable. On the Tongass National Forest, we encourage the public, in general, to present management ideas, proposals, and options to us for consideration.



Steve Lewis or Rachel Myron  
<tenakeetwo@yahoo.co  
m>

To: comments-alaska-tongass-hoonah@fs.fed.us  
cc:  
Subject: iyouktug

11/18/2007 01:24 PM

PO Box 53  
Tenakee Springs, AK 99841

Gentlefolk:

SL-1 As a resident of Tenakee who hunts deer and researches humpback whales, I am concerned about the proposed volume of the Iyouktug Timber Sale that abuts False Bay. I think that the proposed volume of 59.8MMBF is greatly in excess of what can be used by local mills---unless the sale is extended to supply these folks for the next 2 decades. / Otherwise the volume harvested will go to distant mills and require local mills to search ever harder for any timber that won't seriously impact the deer populations around Hoonah. / SL-2 Recent heavy snows have already seriously impacted deer populations and clearcuts are known to exacerbate this problem since the SL-3 old-growth canopy so critical for maintaining accessible winter forage during snowy winters is lost when forest is clearcut.

SL-4 It is unclear what the impact to productivity of the waters around False Bay will be with further heavy upland harvest, but the potential exists to damage an area heavily used by humpback whales foraging in the summer and fall.

SL-5 Furthermore, this sale appears to target a species that is rapidly disappearing from the Tongass. Yellow cedar is declining throughout the forest and regeneration is virtually non-existent. It seems very unwise to target this species, at least until we understand what is causing the decline of existing stands and how to reestablish harvested stands.

SL-6 To summarize, the proposed Iyouktug sale is too large for the small mill owners in Hoonah to use effectively. It targets yellow cedar, a species that is declining for unknown reasons and failing to reestablish itself after harvest. / It also will have large effects on the habitat needed by Sitka black-tailed deer, habitat that has SL-7 already been heavily impacted (nearly 50% harvested) during the Alaska Pulp Corporation's harvest. / It will also impact uplands that SL-8 may be important in maintaining the productivity of False Bay, an area heavily used by feeding humpback whales.

SL-9 I support providing timber for the small mills in Hoonah, but the current scale of the Iyouktug Sale fails to do this in a rational way. The sale need to be scaled way way back to meet these mills needs while avoiding damage to other resources critical to maintaining a healthy and dynamic terrestrial and marine ecosystem.

Thank you for your consideration of these issues.

Sincerely,

Steve Lewis

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Be a better sports nut! Let your teams follow you

**Responses to SL – Steve Lewis**

**SL-1** - Please see responses to BC-4 and EH-1.

**SL-2** – We recognize the need for local timber, which was one reason for including local sawmills and timber operators in the Purpose and Need for this project (Chapter 1, DEIS and FEIS). Please also see response to BC-4 and EH-1.

**SL-3** - The DEIS and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Management Indicator Species (MIS) and Other Wildlife, Sitka Black-tailed Deer section address the effects of the recent heavy snows. These sections were updated to include recent information about deer mortalities that resulted from the 2006-2007 winter.

**SL-4** – In our Essential Fish Habitat analysis and consultation with National Marine Fisheries Service (DEIS, Chapter 3 Environment and Effects, Watershed and Fish, Essential Fish Habitat section), we did not find that waters in, and thus productivity of False Bay would be damaged. The analysis on potential adverse effects on marine EFH can be found in the DEIS, Chapter 3 Environment and Effects, Watershed and Fish, Essential Fish Habitat section. Our analysis concluded that by following Forest Plan Standards and Guidelines and leaving buffers on all Class I, II, and III streams as well as the 1,000 ft beach buffer will protect water quality and aquatic habitat in areas where there is upland harvest (DEIS, Chapter 3, Watershed and Fish, Essential Fish Habitat). Effects to the humpback whale are address in the DEIS and FEIS Chapter 3, Threatened, Endangered, Petitioned, and Sensitive Wildlife Species.

**SL-5** - Please see response BC-22 and BC-23. Please also see the FEIS Chapter 3, Silviculture and Vegetation, Forest Health and Natural Disturbance, Yellow-cedar decline.

**SL-6** - Please see responses to BC-4 and EH-1.

**SL-7** – Please see the response to SL-3. The deer analysis considered the effects of past harvest and supports your statement that deer habitat will be affected by the action alternatives.

**SL-8** – Please see the response to SL-4.

**SL-9** – Please see responses to SL-2, BC-4 and EH-1.