

**Alaska Wilderness League • Alaska Rainforest Defenders • Center for Biological Diversity
Earthjustice • Natural Resources Defense Council • Southeast Alaska Conservation Council
WECAN • Wild Heritage**

February 1, 2024

Submitted via U.S. Forest Service Comment Portal and Electronic Mail

The Honorable Randy Moore
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**Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the
National Forest System #65356**

Dear Chief Moore, Ms. Walker and Ms. Crocker:

On behalf of the above-listed organizations and our members and supporters in Alaska and nationwide, we submit the following comments on the U.S. Forest Service's ("Forest Service") notice of intent to prepare an environmental impact statement ("EIS") to amend all land management plans to provide direction for old-growth forest conditions across the National Forest System ("System").¹ Specifically, we are writing to urge the Forest Service to remove the Tongass National Forest ("Tongass") old-growth logging exemption from any further analysis in the upcoming EIS.² This exemption, described in the fourth standard in the notice of intent, allows old-growth logging to continue where "necessary to allow for implementation of the

¹ 88 Fed. Reg. 88,042 (Dec. 20, 2023).

² *Id.* at 88,047 ("4. Exceptions to standards 2 and 3 may be granted by the Regional Forester in Alaska if necessary to allow for implementation of the Southeast Alaska Sustainability Strategy and the rationale must be included in a decision document.")

Southeast Alaska Sustainability Strategy” (“SASS”) and is inconsistent with the purpose of this land management plan direction and unnecessary for the Tongass.³

The nationwide land management plan amendment currently under scoping is intended to maintain, develop, and recruit old-growth forest conditions, addressing the need to improve conservation of old-growth forests across the System. The Tongass in southeast Alaska contains some of the best and largest temperate old-growth forests left anywhere in the world. While so much has been lost, the remaining old-growth in the Tongass provides substantially more carbon storage and sequestration than any other national forest, making protection of these trees essential for addressing the climate crisis.⁴ Alaska’s salmon, wildlife, people, and economy all depend upon old-growth habitat in the Tongass.⁵ It’s vital these irreplaceable old-growth forests are fully protected.

The SASS sets out in many respects a positive direction for the Tongass, and no exemption from this national land management planning direction is needed to ensure that the constructive components of the vision it adopts can be carried forward. Under SASS, the Forest Service has restored the Roadless Rule on the Tongass and begun to shift its resources to support and invest in forest restoration, recreation, and resilience throughout the region.⁶ These changes and investments, and the partnerships the Forest Service has developed through implementing them, support the region’s primary economic drivers and bolster the resilience of the forest and the people who depend on its habitat. Old-growth ecosystems support the region’s economic mainstays—the seafood and visitor industries—and the wild foods economy and subsistence ways-of-life of Alaska Native peoples.⁷ We support these changes in how the Forest Service does business in southeast Alaska and believe that including protection for the remaining old-growth, through this national forest plan amendment, is a critical next step.

To maintain and develop old-growth forest conditions and improve their conservation in the Tongass, the Forest Service must remove the Tongass old-growth logging exemption. The SASS, as it is currently described in Forest Service documents, requires the phasing out of “large scale” old-growth logging in the Tongass, but allows old-growth logging to continue for commercial purposes.⁸ Building this logging into future forest plan direction through the proposed exemption is inconsistent with this Administration’s global climate commitments and the SASS goals of supporting the needs of the region. The transition out of old-growth logging for the Tongass began with a directive from Secretary Vilsack issued more than ten years ago in July 2013,

³ 88 Fed. Reg. at 88,047.

⁴ Law, B.E. et al., Southern Alaska’s Forest Landscape Integrity, Habitat, and Carbon Are Critical for Meeting Climate and Conservation Goals, 4 AGU Advances e2023AV000965 (2023); *see also*, DellaSalla, D. A. et al., The Tongass National Forest, Southeast Alaska, USA: A Natural Climate Solution of Global Significance, 11 Land 717 (2022).

⁵ Smith, W. P. and Flaherty, E. A., Wildlife studies on the Tongass National Forest challenge essential assumptions about its wildlife conservation strategy, 87 J. Wildl. Manag. E22450 (2023).

⁶ *See* U.S. Forest Service, Southeast Alaska Sustainability Strategy, <https://www.fs.usda.gov/detail/r10/landmanagement/resourcemanagement/?cid=FSEPRD950023> (outlining the components of SASS).

⁷ *See* U.S. Department of Agriculture, *USDA Southeast Alaska Sustainability Strategy Investment Recommendations, Appendix E: Regional Economic Overview*, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1012381.pdf.

⁸ U.S. Forest Service, Southeast Alaska Sustainability Strategy: Forest Management, Alaska Region at 3 (2022).

which was adopted in the 2016 Tongass Forest Plan, and is now a component of the SASS.⁹ A decade into that transition, there is no need to allow ongoing old-growth logging for any purpose, commercial or otherwise, except for culturally significant uses by Alaska Native peoples, which this forest plan amendment provides an exemption for.¹⁰ There is a ready and ample supply of second growth in lower conservation value areas with open road networks that can support existing local mills.

In addition, while we expect to see the Forest Service continue its commitment to the SASS goals, the SASS is an unenforceable policy that has not been adopted as a regulation or otherwise made durable. A future administration, under the Tongass exemption as proposed, could return to clearcutting tens of millions of board feet of Tongass old-growth annually by simply revising the SASS goals with no public process. We believe Tongass old-growth forests, like the rest of the nation's old-growth, need permanent protection and should not be exempted from this national action.

The Tongass exemption is inconsistent with the purpose and need of the nationwide land management plan amendment, as well as President Biden's Executive Order 14072 Section 2 to "manage forests on Federal lands, which include many mature and old-growth forests, to promote their continued health and resilience [and] retain and enhance carbon storage [...]."¹¹ Tongass old-growth forests deserve the same protections being considered for every other national forest in the country. As such, we urge you to remove the Tongass old-growth exemption from any further analysis. At the same time, we look forward to continuing to work with the Forest Service to implement the SASS goals of supporting restoration, resilience, recreation, and the needs of the region, and making those policy shifts durable for the Tongass.

Sincerely,

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⁹ U.S. Department of Agriculture, Secretary's Memorandum 1044-009: *Addressing Sustainable Forestry in Southeast Alaska* (July 2, 2013).

¹⁰ 88 Fed. Reg. at 88,047 (2. (b) "Exceptions to this standard may be allowed if the responsible official determines that actions are necessary: [...] iv. for culturally significant uses;").

¹¹ Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies (Apr. 22, 2022).

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