



**Alaska Forest Association**

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September 16, 2024

Director, Ecosystem Management Coordination  
201 14th Street SW, Mailstop 1108  
Washington, DC 20250-1124

Attn: Jennifer McCrae, Forest Service Team Leader

Dear Ms. McCrae:

Thank you for the opportunity to submit comments on the Draft EIS Published June 2024 entitled "Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System."

The Alaska Forest Association (AFA) is one of Alaska's oldest trade organizations representing a variety of members in the forest products industry in Alaska. AFA's members include operators, tribal organizations, non-profits, contractors, industry support organizations, and individuals. AFA members are small, family-owned businesses who provide year-round, family-wage jobs in communities across Alaska. On average, AFA members directly contribute \$65million to the local economies of AK, serve as anchor tenants for power and electrification in remote communities, provide, construct, and operate sector infrastructure, and supply music, building materials, and custom interior wood products to the world.

AFA believes the Draft EIS unnecessary, inappropriate, and in violation of multiple federal statutes and regulations governing the management of the national forests across the country and specifically within Region 10. AFA's comments during the Notice of Intent (NOI) comment period addressed why the Amendment is unnecessary and violates federal statutes. Those comments are included within these comments regarding the Draft EIS by reference.

AFA requests that the USFS discontinue the EIS process to amend all forest plans for the National Forest system units. If the USFS moves forward with the EIS process the AFA supports the selection of Alternative #1, the No Action alternative.



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If an action alternative is selected as the preferred alternative AFA requests that Region 10 be exempted from inclusion within the chosen alternative for the following reasons:

1. Unlike many regions, and the National Forest(s) contained within those regions, there is no shortage of Old Growth (OG) forests within Region 10. Further, existing forest plans for the Chugach and Tongass National forests protect the majority of OG forest stands within each Forest.
2. The Chugach does not have an allowable cut and the Roadless Rule, which prohibits the cutting of timber within a roadless area, protects approximately 95% of the Forest.
3. The 2016 Forest Plan for the Tongass allows for the harvest of timber on 326,623 acres of the approximate 16.8 million acres within the Forest. Almost two thirds of the 326,623 acres contain stands of young growth (YG) timber. The harvest of (OG) timber on lands suitable for timber production is based on an actual analysis conducted during the planning process of the Forest Plan.
4. The Southeast Alaska Sustainability Strategy (SASS) press release of July 2021 reduced the amount of OG annual harvest on the Tongass to 5 MMBF instantaneously, a volume that the Tongass has not come near to offering since July 2021. In addition, the Forest Plan for the Tongass contains an Old Growth Reserve system that ensures OG habitat for OG dependent wildlife species.
5. The nation-wide OG Amendment does not consider the multitude of federal statutes that mandate the active management of timber resources within the National Forest system including the Organic Act, National Forest Management Act, Multiple Use-Sustained Yield Act and the 2012 Planning Rule. It also does not address the "no-more clause" of ANILCA (Public Law 96-487) and the "seek to meet" clause of the Tongass Timber Reform Act (Public Law 101-626) both of which are specific to Alaska.



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Finally, given the incongruity between the Draft EIS and the existing efforts of the USFS to revise the Tongass Forest Plan, AFA requests that the USFS stop all work on the current Plan revision until after the FEIS for the national OG amendment is completed. While AFA recognizes that this input may appear to be outside of the subject comment period, it is not outside of the scope of rational, legal, productive, and efficient and effective agency activity.

Thank you in advance for your thoughtful consideration of AFA's comments.

Regards,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long horizontal line that tapers to the right.

Tessa Axelson, MPA  
Executive Director