



**Alaska Forest Association**  
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Submitted via online portal

February 24, 2025]

Erin Matthews  
TLMP Revision Coordinator  
US Forest Service, AK Regional Office  
709 W. 9<sup>th</sup> Street, Suite 923  
Juneau, AK 99801

RE: TLMP Draft Assessment Public Comments

Ms. Matthews,

This letter is written to provide public comment by the Alaska Forest Association (AFA) on the US Forest Service (USFS) TLMP Draft Assessment. 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 small, medium, and large operators, tribal organizations, contractors, industry support organizations, and individuals from across the state.

AFA requests that the assessment include an outline and explanation of each of the pertinent laws and regulations that the USFS will need to follow and meet when developing a new forest plan for the Tongass.

All assessments should be developed using the "best available science". To AFA that means that only scientific research done on southeast Alaska and done after the 1997 forest Plan should be used. All research done before the 1997 Plan should have already been taken account of during the development of that Forest Plan. Also, "industrial scale" logging ended in 1997 with the shutdown of the last operating pulp mill in the region. Studies done outside of the Tongass National Forest are not capable of analyzing the uniqueness of the Tongass. Research, studies, and conclusions based on information gathered prior to 1997 or from outside of southeast Alaska should be removed from the draft assessments. The conclusions should be redrafted to represent conclusions based on the current "best available science" for the current industry.

When appropriate, assessments need to include historical information regarding past management scenarios used by the USFS or adjacent landowners. As an example, in the 1960s-1980s the USFS had the timber industry remove all large woody debris from fish streams to generate improved pink and chum habitat.



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Whenever appropriate, assessments should include current land management decisions that directly affect the communities within southeast and their environment; as an example, permit requirements for development within inventoried roadless areas have made multiple hydropower projects uneconomical to build. Consequently, communities across the Tongass are still primarily or totally dependent on diesel-fired electrical systems to provide power for residents. It is estimated that Angoon spends a million dollars annually on diesel fuel for its power generation needs. Diesel fired generators produce 22.38 lbs. of CO<sub>2</sub> for every gallon burned.

The Indigenous Place assessment is missing the past timber practices of the regional and village corporations of southeast. The assessment mentions numerous times that Sealaska has stopped their industrial timber harvest operations and speaks of the differences between regional and village corporations. There is nothing in the history regarding the fact that native corporations clearcut harvested more acres in less than 30 years than have been clearcut harvested on the Tongass in the last 100 years. There is also no discussion of the Sealaska Entitlement bill which allowed the corporation to reselect lands to help in the development of a sustainable timber management program.

AFA questions the reasonableness of proceeding with the revision at this time. Given the rapid changes occurring within federal agencies, and the USDA and USFS specifically, as well as recent determinations made by the Supreme Court regarding the Council on Environmental Quality (CEQ) and NEPA regulations and reforms it seems that a great deal of effort, by preciously limited personnel, will be expended on a process that is very unlikely to see finalization in any substantive form. Wouldn't the most efficient and effective course of action be to pause the process until there is clear direction?

Thank you for the opportunity to comment. Please contact me at either [tessa@akforest.org](mailto:tessa@akforest.org), or 907-225-6114.

Regards,

A handwritten signature in black ink, appearing to be the name "Tessa Axelson", written over a horizontal line.

Tessa Axelson  
Executive Director