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Comment on Draft Plan Content and Proposed Management Areas

Thank you for sharing this Draft Plan Content. We appreciate that the agency is attempting to address tourism management. The Forest Plan has the opportunity to set a clear vision for managing outdoor recreation and tourism on the Tongass for a generation. This vision should reflect the needs of Southeast Alaska communities, articulate the goals for how commercial recreation will benefit regional and community prosperity, and what this use will look like.

The Tongass Recreation Partnership has made extensive efforts to provide guidance and develop plan components that reflect local input and conform to the 2012 Planning Rule. Our products include a proposed vision for managing recreation, draft desired conditions, standards, guidelines, and monitoring protocols. We hope that the products we've developed can continue to be incorporated into the plan's development.

Concerns with Timing

We have concerns about the timeline that the agency is following for this process, and concerns about the ability of agency staff to analyze and incorporate public comment, given current capacity. The quick turnaround on comment periods undermines trust that this round of feedback can be meaningfully integrated. The agency has not had the time to complete important steps, such as mapping the Recreation Opportunity Spectrum classes, or analyzing and incorporating input received in the NOI comment period. We appreciate the opportunity to make comments on these ideas as they're being developed. However, we encourage the

agency to take the time to review and incorporate our initial comments made during the NOI comment period before proceeding to the EIS analysis.

Tourism and Recreation Futures for Analysis in EIS

What the Forest Service should analyze

The USFS should analyze how prioritizing outdoor recreation management could support the objectives detailed in the draft Need For Change in the NOI. These objectives include the need to simplify the plan, prioritize local and regional prosperity, incorporate strategies to address tourism, encourage collaboration and stewardship, consider the subsistence needs of communities, and respect indigenous knowledge. We believe that if the agency analyzes shifting focus to the best-performing assets, including outdoor recreation, the agency could achieve better social, environmental, and economic outcomes. Outdoor recreation is the largest regional economy, yet the agency has not contemplated focusing on this sector, or investigated the outcomes of their approach, or their return on investment to the treasury, to local economies, or to social and environmental sustainability. Analyzing this management approach is in line with the agency's obligations to analyze a range of alternatives.

Our Vision for Managing Outdoor Recreation

This vision is informed by extensive public engagement and the results of the Spruce Root Scenario Planning project. Our vision is that the Forest Service will:

- Make outdoor recreation work for communities. The agency works with communities to build outdoor recreation infrastructure that follows the community planning and vision and drives desired local benefits.
- Build and maintain trails and recreation infrastructure.
- Seek to manage commercial uses so that locals do not feel overwhelmed and displaced in their own communities.

The Forest Service needs proper planning and execution of a management strategy for outdoor recreation. Continuing business-as-usual or pursuing a cruise-only tourism focus will not meet these goals.

Recreation Opportunity Spectrum Classes

The Plan should provide a diverse range of recreation opportunities across the Forest. Each community should have opportunities for diverse recreation opportunities, including "Alaska-style" remote and self-reliant experiences, as well as trails and recreation facilities accessible from our communities. The ROS provides a mechanism to define the recreation opportunities we want to protect and manage on the Tongass through the life of the Plan. The ROS classes should be used to guide management and define the experiences we want to provide, not just describe existing conditions. We look forward to offering comments and feedback on the ROS maps when they are released.

Scenery Standards

Scenery management on the Tongass is crucial for supporting the largest economy in Southeast Alaska, Recreation and Tourism. Given the changes that will come with simplifying the current LUD system, the Forest Service needs to ensure that scenic objectives are prioritized and in line with the recreation experiences locals and visitors expect when in and around the Tongass. The current SIO and VPR framework is extremely outdated and fails to account for many of the most important routes, means of transportation, and areas from which the Tongass is viewed. For the new management plan to adequately address scenery, it must be tied to both the Recreation Opportunity Spectrum as well as marine and aviation-based travel/recreation. We offer the following recommendations to ensure current use patterns are accommodated and the scenic integrity of the forest is maintained:

1. Align the Scenic Management System with the Recreation Opportunity Spectrum.
    - Since ROS defines the visitor experience throughout the forest, the SMS and all Scenic Integrity Objectives should have high standards tied to the ROS. Additionally, all designated Visual Priority Routes should have a default of “High” SIO regardless of the underlying ROS classification to protect the viewsheds that support the regional recreation and tourism economy.
2. Modernize the VPR Inventory to include all recreation-related activities.
    - The current VPR list excludes some of the most socially and economically valuable uses of the forest, such as flightseeing and small cruise tours. Since 2008, when the VPR was last updated, flightseeing tours and small cruise routes have emerged and are currently unaccounted for when planning for the scenic integrity of various projects. Popular sea kayaking routes, both commercial and non-commercial, should be included in the VPR as well, given the significance of visitation from around the world to kayak throughout Southeast Alaska.
3. Adopt the existing condition where SIOs are currently exceeded.
    - Much of the Tongass currently exceeds the areas designated SIO. The current condition of these areas should be adopted as the new minimum SIO to ensure the new plan does not set a lower standard than the current condition.
4. Apply SIO standards universally across forest uses.
    - SIO standards in the 2016 Tongass plan are based primarily on timber projects. Given the increase in mining, large-scale utility infrastructure, and other industrial developments, the new plan must ensure that SIOs include impacts from all uses of the forest, not just timber.

Responses to Draft Management Areas

Thank you for attempting to address interest in outdoor recreation in the draft plan content, particularly commercial tourism and local use. Recreation and tourism use is growing across the Forest, and the Forest Service should analyze an approach that sets a vision across the Tongass National Forest for outdoor recreation. These maps capture some elements of

commercial tourism and local recreation use, but in general do not reflect the scale and diversity of outdoor recreation occurring on the Tongass. The very open-ended guidance in the plan does not provide sufficient guidance for the Forest Service to address the key issues facing outdoor recreation.

At this stage, we think the best approach may be to work through the ROS process and other required processes and then determine what additional guidance is needed in order to meet a clear vision for outdoor recreation management. The Forest Service should work with partners to shape the desired ROS classes before proceeding. At this stage, we're not sure if these proposed Management Areas are the right types of management areas, or if they're in the right places.

Management Areas to manage recreation and tourism need to follow from a more articulated vision of the role that the Forest Service will play in Southeast Alaska.

- These areas codify things as they are, which may contribute to concentrating negative impacts (helicopter traffic to ice fields, road situation in Hoonah, no FS land options in Ketchikan).
- Say more about how we will build trails, and how cabins and other noncommercial infrastructure would be treated. These are places where expedition ships are expanding and where small communities may want to develop different kinds of tourism.
- Needs to articulate how these management areas are in line with emerging and potential tourism markets.
- Puts emphasis on cruise tourism, but says nothing about the opportunities that communities like Wrangell are pushing for (moderate development).
- Has contradictory Management Areas (such as high commercial use in remote areas of POW, no high use for Ketchikan) that fail to meet community needs and desires.
- General Forest and Old Growth Management Areas do not provide a framework for addressing the growth of remote commercial tourism.

High Commercial Recreation Use

- Many of these areas are inappropriate for high commercial recreational use.
- These areas are in remote locations that are not associated with cruise ship communities.
- These areas don't reflect tourism developments close to communities.
- The areas are too dissimilar to have a consistent management direction applied. Many of these areas are remote places where people do not want similar levels of tourism activity to the Mendenhall Glacier. The Mendenhall Glacier Recreation Area should probably be a specific geographic area.
- How does the plan consider that the Mendenhall Glacier will not be visible from the Visitor Center in the life of the plan.

- While we recognize the desire of local residents to protect local use, there is no area that would allow for the development of commercial infrastructure and permitting around Ketchikan, a major cruise port.
- This would lock in areas already experiencing high use or overuse. Presumably would lead to more helicopters on the Mendenhall Glacier, which means more helicopter noise in Juneau.
- Doesn't identify specific places or concepts for high-throughput visitor areas.

Low Commercial Recreation Use

We appreciate the Forest Service contemplating areas where local communities may not want additional tourism pressure.

- If the agency uses these Low Commercial MAs, it should clarify what commercial use would look like in these areas and how the agency would prioritize uses. How would the Forest Service treat commercial use applications from locals looking to start a business?
- Does not provide sufficient coverage or direction to protect local uses in communities across Southeast Alaska.
- Consideration of local and commercial uses needed for all towns, not just cruise port ships. Should give guidance for small cruise ship focus, lodges, and other forms of commercial recreation.
- These areas only comprise a small portion of the commonly used areas for local non-commercial recreation. Need to explain how these areas are distinct from community use areas, and how very popular local recreation areas, like the Herbert Glacier, don't fit.
- Community Use Areas may make more sense.

Community Use Areas

- If using community use areas, should have them for all communities.
- These areas should be geographically linked to the community, and need to take into consideration all of the different ways the community uses the landscape, including recreation and subsistence.
- Do not currently provide sufficient coverage or guidance to protect community uses.
- The Forest Service should clarify what the additional direction is: what is allowed/what is not allowed, define shared stewardship, define the process for engaging with the community.

Old Growth

- Protecting scenery and natural habitat for fish, wildlife benefits recreation.
- Clarify the role of local and commercial recreation in these areas.
- Does not provide a good framework for ensuring that remote outdoor recreation experiences are well distributed.

- Need additional and more geospatial explicit guidance for tourism and recreation. Significant commercial operations are taking place in these areas and locals are using these areas for recreation and subsistence.

Key Fisheries Watersheds

- Wild salmon, and their freshwater habitat are important recreation resources on the Tongass.
- Clarify what kinds of activities are allowed.
- While restoration activities can be beneficial in the long term, active management can reduce commercial and noncommercial recreation opportunities.

General Forest

- Opportunity to define a region-wide strategy for tourism and how it supports SE communities.

Our Proposed Desired Conditions and Plan Components

In our NOI comment letter, we offered three high-level concerns as a result of the work and research we have conducted in Southeast Alaska**:**

- The need to build and maintain trails as a part of this region's way of life.
- Take this opportunity to reduce potential and ongoing conflicts between noncommercial and commercial recreation users in the Tongass.
- Manage the land for the long-term benefit of local residents.

Based on expert interviews across Southeast Alaska, the Tongass Recreation Partnership confirmed that residents would like the Forest Service to maintain existing infrastructure while also investing in new recreation infrastructure. Interviewees perceived conflict across the region with commercial tourism and access to fishing, and highlighted potential incompatibilities with timber management and motorized use in identified geographies.

Through our interviews, local experts generated 220 site-specific comments that the Forest Service can use to shape zoning and desired ROS classes. These comments were submitted during the NOI process.

The Tongass Recreation Partnership has drafted a plan monitoring framework that links monitoring questions directly to the plan components we've recommended. Adaptive management requires regular evaluation and feedback, which ensures that if desired conditions and objectives are not being met, the agency undergoes meaningful change to reverse that trend. Please refer to our NOI submission for the detailed table of the monitoring framework.

Our Proposed Desired Conditions

The desired conditions currently listed in the Forest Plan are not specific enough to guide management. The following list has been developed by the Tongass Recreational Partnership to address our vision.

- Recreation and tourism sustainably support local prosperity. Forest Service staffing, leadership, and resources are aligned with the scale and growth of recreation demand.
- The Forest Service is able to use accurate and timely information in analysis and discussions with partners.
- Projects are identified with community partners, stakeholders, local governments, and commercial operators.
- Trails are typically well-maintained, and new trails and recreation infrastructure have been established to meet both local and commercial needs. Local residents typically do not compete for access to trails and recreation opportunities, and reservations are typically not needed or not highly competitive.
- Forest Service special use permitting supports locally based businesses that drive rural prosperity and enhance community social, economic, and environmental resiliency.
- Southeast Alaska is still awesome. People have opportunities for both developed and unconstrained remote recreation from each community. Lots of wild, uncrowded shorelines, forests, and mountains.

Our Proposed Standards and Guides

The following plan component recommendations are organized into six core categories designed to transform the Forest Service into an organization capable of sustaining a world-class recreation and tourism economy while protecting the wild character of Southeast Alaska upon implementation:

1. **Data Collection:** The Forest Service needs to start by collecting good data on recreation and commercial use, the status of infrastructure, and economic impacts.
2. **Assign Management Priority:** Make tourism and recreation a core strategy for supporting rural prosperity. Prioritize leadership, staffing, and resources to meet the needs of this growing sector and ensure its sustainable management.
3. **Collaboration Framework:** Establish a clear vision and pathway for managing tourism growth in partnership with local communities and across jurisdictions. Utilize partnerships to prioritize staffing and funding to ensure trails are adequately maintained and improved over time. Support communities in shaping tourism to their benefit, and coordinate management based on knowledge of tourism use on lands adjacent to forest lands.
4. **Maintain and Build Trails:** The plan needs to give the Forest Service clear targets and direct the agency to invest more in the maintenance of existing trails and build more trails and recreation infrastructure.
5. **Zone and Manage Recreation and Tourism:** Utilize zoning tools and permitting to outline specific, area-based management strategies and goals.
6. **Keep Alaska Awesome:** The Tongass National Forest supports outstanding world-class recreational opportunities; we want to see these opportunities continue.