March 20th, 2026

VIA CARA.FS2C.USDA.GOV
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Comment on Notice of Intent and Need for Change, Report on Outreach Results, Recommended Analysis and Alternatives, and Draft Plan Components

Thank you for the opportunity to comment on the Notice regarding the Land Management Plan Revision for the Tongass National Forest. The Tongass Recreation Partnership is a network of Southeast Alaskans advocating for better representation of outdoor recreation in the new Tongass Plan. In this document we offer our comments on the Need for Change and the Notice of Intent. We also share the results and analysis of our outreach efforts to recreation experts around the region, and share 220 geospatially linked comments on outdoor recreation conflicts and opportunities. We present recommendations for analysis as well as suggestions for Plan Alternatives, as well as draft plan components including desired conditions to guide sustainable recreation management. As the agency contemplates zoning and other policy changes, we hope to continue open conversations about how to move forward.

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Notice of Intent and Need to Change Comment

The Notice of Intent makes significant strides by acknowledging the evolution of recreation on the Forest and the importance of the outdoor recreation economy. However, in addition to good plan content, the agency needs to show a willingness to prioritize recreation through leadership direction, staffing, and capacity. Investments in recreation pay off for the Forest Service, local communities, and businesses. The best performing assets on the Tongass are the trails and visitor centers, the natural landscape, fish and wildlife. These assets are core to the Southeast recreation and tourism economy.

The proposed new management areas suggest a significant change in management that deserves a slow and careful process. Strategic zoning and plan components are critical to supporting the growth of outdoor recreation and the recreation economy.

What Recreation Users Want

Most recreation use is based around communities, with a desire for Alaska-quality experiences: good hunting and fishing, world-class natural scenery, and the ability to get away from development and crowds. Visitors come to Alaska for the beauty, the good fishing, but also the vast scale, intact landscapes and ecosystems that no longer exist elsewhere in the rest of the country. While there may be opportunities for recreation infrastructure that helps users get through previously developed landscapes, the main draw of Alaska recreation is the wild character of the land. Trails, cabins, and other Forest Service infrastructure helps people enjoy

these places. We refer the planning team to our report on the “State of Recreation,” submitted during the Assessment process, and our interviews with recreation leaders around the region.

Comments on Need to Change

Focus on Recreation and Tourism

We are very glad to see the agency recognize the need to address changes in recreation and tourism, the importance of recreation and tourism and the essential role of the Tongass. We agree that the guidance is outdated and fails to reflect the growth in recreation use and tourism. In addition to the growth of cruise ships and the associated growth of community-based day tour operations in port communities and on the Tongass, we have also seen dramatic growth in sport fishing for salmon from the forest, yacht tours, expedition-style small ships, and glacier flight seeing, and noncommercial recreation which all use the Tongass.

Outdoor recreation is where an entrepreneur is likely to start a business in Southeast Alaska, and where the Forest Service has the opportunity to support and guide this economy.

However, the lack of leadership direction, Ranger authority, and capacity prevents the Forest Service from capitalizing on recreation and tourism. The plan needs to set this priority in order to manage conflicts, realize economic gains, and prioritize local and regional prosperity. This will look like a plan that directs the Forest Service leadership, line officers, and staff to manage outdoor recreation and tourism.

From our interviews, surveys, and experience, the main questions for the Forest Service are:

- How will the USFS shift to prioritize recreation infrastructure and additional recreation capacity?
- How will the USFS balance and mitigate commercial impacts on non-commercial users?
- How will the USFS manage recreation in the Tongass to ensure local benefit?

The Tongass Recreation Partnership has identified the following six focus areas that we see as crucial to addressing the questions above.

- Data Collection: Make data collection and monitoring a core activity. Collect data on commercial tourism and non-commercial recreation to better inform decision making by the USFS and local partners.
- Assign Management Priority: Make recreation and tourism the management priority, not an afterthought.
- Collaborate: Engage meaningfully with regional partners during the planning process and plan implementation to identify, prioritize, and execute recreation projects.
- Maintain and Build Recreation Infrastructure: Develop clear targets and standards to eliminate the maintenance backlog and support the growing demand for trails, cabins, and other recreation infrastructure.
- Zone: Manage recreation and tourism through clear zoning and permit standards for local benefits.

- Keep Alaska Awesome: Protect experiences, viewsheds, and ecosystems that define the Tongass for both locals and visitors.

Prioritize Local and Regional Prosperity

The tourism industry is the largest economic sector in Southeast Alaska. It is directly reliant on the natural landscapes, scenery, fish and wildlife, and recreation infrastructure of the Tongass. Recreation investments can directly support entrepreneurs who grow local prosperity, support local community recreation, and other uses.

Recreation is a high-performing asset

Recreation investments offer the Forest Service a significant return, catalyzing local economic activity while generating essential agency revenue. The Forest Service should take ownership of the successful recreation and tourism economy. The trails and facilities, as well as the scenery, fish, and wildlife, are the inputs of this economy. Recreation receipts average $5 million annually. Creative new approaches and partnerships could increase returns to the agency.

Rather than capture a snapshot of the current outdoor recreation demand, this plan needs to model the growth of the tourism industry and make a plan to guide more local benefits. The plan should identify and manage resources like: scenery, fish and wildlife, as well as infrastructure like trails, wildlife viewing areas, and other recreation infrastructure.

ROI from recreation investments

Mendenhall Glacier Visitor Center is the main example of a developed frontcountry facility. Each year averages 490,000 commercial visitors, with total visitation much higher. The cheapest commercial operators charge ~$80/person which is minimum of $39.2 million into the economy each year. The Forest Service gets an average of 9599 commercial users just on Mendenhall Lake, putting another $2.8 million of revenue into the local economy.

Wildlife viewing areas create high-value experiences. At bear viewing areas like Pack Creek, Anan Creek limited numbers to preserve the resource of viewable bears. People are paying ~$1000/person/day. Annually driving $770,000 in revenue to local businesses. Pack Creek is an important piece of business for small float planes that serve rural communities. Pack Creek requires minimal investment: Staffing the program costs $350,000 per year with minimal trail and viewing infrastructure. This investment creates double the return in the local economy. Limited volume is essential to preserve experience, but the Forest Service could create more bear viewing areas around other communities and create economic opportunities in those communities.

A single trail can make a big difference. Examples include the Lake Eva Trail, which is used by high-end cruise ships. We calculate that this trail creates $3 million of economic value each year. This illustrates the point that building more trails can create more value and opportunity. The Forest Service, partners and businesses can explore new funding mechanisms to build trails, but Forest Service leadership direction and capacity is needed.

Managing for Local Prosperity

- Zoning/Management areas that ensure high-quality, Alaska-style recreation experiences for every community and that protect scenery, wildlife, fish, and cultural uses for every community.
- Develop opportunities for local entrepreneurs in the Southern Tongass to meet growing demand.
- Commercial permits should result in locally owned businesses with local employment.
- Respond to permit applications within a set timeframe.
- Review group-size limits to reduce crowding and protect quality of experience, subsistence and recreation.
- Consider daily or hourly use limits at high-demand locations to prevent overload.
- Use Tribal and community recreation plans to guide permit decisions

Collaboration opportunities

We lay out initial considerations for developing collaboration frameworks to benefit recreation projects in our proposed plan components.

Subsistence Use

We agree that the plan must consider the agency's legal obligations to subsistence use. We do not want to see outdoor recreation impair subsistence use. The Forest Service should ensure that recreation management and commercial tourism use does not impact subsistence uses. The Forest Service should analyze how recreation programs and infrastructure impact or even support other uses, such as subsistence. Trails, cabins, and other FS infrastructure can support subsistence use, such as hunting, fishing, and gathering.

Consider Indigenous Knowledge

The plan is the place to set up new approaches to incorporating indigenous traditional knowledge. We welcome this effort to incorporate indigenous traditional knowledge into Forest Management.

Scenery Standards

Scenery is a core component of the Tongass recreation and our tourism economy. We look forward to engaging in a productive conversation to maintain strong scenery standards that ensure that outdoor recreation users can enjoy the Alaska experience. Local recreation users have expressed dissatisfaction with timber harvest around beloved cabins on POW. The Tongass needs strong scenery standards that consider new transportation routes such as small ship and yacht routes, flight routes, community desires, and views from trails and recreation infrastructure.

The scenic beauty and visual landscape integrity of Southeast Alaska is fundamental to its recreation and tourism appeal. Research from other regions demonstrates that scenic quality has measurable economic value. The Tongass, with its dramatic coastlines, glaciers, and

temperate rainforest, merits a rigorous analysis of how management decisions affect this critical asset.

Deer and Fish Habitat

Hunting and fishing are important recreation activities for locals and commercial visitors. The NOI says no major changes may need to be made to deer and fish habitat conservation zoning, but the document contemplates major rezoning. Deer and fish habitat support many community and visitor values including recreation hunting, fishing, food gathering and subsistence. The agency needs to have up-to-date strategies that ensure fish and wildlife populations are healthy and well distributed. Many watersheds readily accessible to subsistence hunting communities have experienced historical timber harvest and clearcut logging that have diminished deer winter habitat quality and population productivity (Brinkman et al., 2011; Gilbert et al., 2020), which will continue to cause population declines (Gilbert et al., 2022) and reduce hunting opportunities (Brinkman et al. 2009) without extensive and expensive wildlife habitat restoration treatments (Manlick et al., 2025).
The lack of attention to salmon in this document is a major omission. Sport fishing is a major component of our outdoor recreation and tourism economy.

Comments on Management Areas

We are interested in continuing conversations with the agency about how to appropriately zone the Forest to ensure great recreation and tourism opportunities. The scale of change and significant changes in tourism will require a deliberate and careful process to ensure we're setting the stage for sustainable recreation and tourism management. At this point, we have tried to offer general comments about these concepts.

- The management areas need to be based on a clear understanding of where people are going. Our recommendations on data collection highlight the current absence of the necessary data to fully support this re-zoning process. Agency mapping of commercial permit holder use and reports on deer harvest are important for understanding important places, but more data needs to be collected to give the USFS a full picture of recreation on the Tongass before major zoning changes are made.
- At this stage, we are unsure how this management would work, and look forward to more discussions. In the NOI, General Forest emphasizes timber, resource extraction, and development. We hope to see multiple uses addressed across the Forest landscape, including recreation opportunities. This sounds like it may better be described as a timber management area.
    - There are opportunities for outdoor recreation infrastructure in developed areas that help people access undeveloped lands, use for motorized or mountain biking trails, hunting or fishing opportunities, or other attractions. People are not typically seeking developed landscapes for recreation.
- We appreciate efforts to integrate community planning and input. Most recreation takes place close to home, and community management would also need to include a

significant focus on sustainable recreation. In Alaska, people expect to have opportunities for frontcountry and backcountry styles of recreation close to their communities. Community areas need to include the areas that get regular community use, including marine-accessible lands. The Forest Service needs to think about balancing commercial and noncommercial conflicts.
    - See our collaboration framework.
    - Defining community roles and public input in these management areas will be crucial to their success.
- Zoning for high and low recreation use likely overlaps with concentration of recreation use around communities and potential community use areas. High and low use may not provide enough distinction to appropriately zone a place like the Lake Eva trail, which is remote and fairly primitive, but receives regular moderate commercial use.
    - Consider frontcountry and backcountry frameworks that focus more on the conditions, and infrastructure.
    - Addressing conflicts between commercial and noncommercial use is a key need. Strict geographic segregation may not make sense given the role that tourism plays as an economic opportunity for rural communities. We look forward to developing these ideas with your team.
    - Forest Service needs a forest-wide strategy to support recreation and tourism, as well as local approaches.
    - Forest Service did district plans for Ranger Districts. How are these being included?
    - Recognize that some places need to avoid infrastructure to preserve the experience. Keep Alaska awesome.
- Manage for conservation. Intact nature is a key component of the outdoor and visitor experience in Alaska. Outdoor recreation is typically conducive to the conservation goals described here. Places outside of designated Wilderness may have additional opportunities for recreation infrastructure that are still conducive to conservation objectives. Restoring and protecting watersheds for deer and fish habitat may also have economic or other noncommercial outdoor recreation opportunities. The conservation of our wildlife and fish heritage benefits outdoor recreation experiences.

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Results from Regional Outreach Efforts

Outreach Overview

In preparation for the revision of the Tongass Land Management Plan, the Tongass Recreation Partnership conducted a comprehensive outreach initiative across the region. This effort was centered on identifying the evolving tourism and recreation related needs of Southeast Alaska's communities, which have seen a massive shift in economic drivers since the last major plan revision in 1997.

Our team conducted in-depth interviews with 36 experts across 13 communities, including Juneau, Skagway, Ketchikan, Craig, Haines, Sitka, Wrangell, Elfin Cove, Gustavus, Hoonah, Klawock, Pt. Baker, and Yakutat. These participants represented a cross-section of recreation experts and municipal leaders. They provided us with 220 comments on areas of conflict, opportunity, and places and experiences to protect. Using a GIS-based survey, we mapped specific geographic points of conflict, opportunities, and high-value "as-is" landscapes. This report summarizes the key themes, conflicts, and opportunities identified during this process.

Primary Conflicts

The following sections summarize the primary tensions identified around growing commercial tourism, non-commercial recreation, development, and the traditional, local uses of the Tongass National Forest:

- **Impact of High-Volume Tourism:** Local residents throughout the Tongass report being pushed out of traditional recreation spots, including fishing holes, trails, cabins, and viewpoints, due to the sheer volume of commercial tourism. This saturation is eroding the solitude and wild character that defines the region.
- **Sport Fishing and Subsistence Pressures:** A major concern across almost every community is the impact of sport fishing on local fish stocks. Unregulated fishing lodges and mass inflows of out-of-state anglers are seen as primary drivers of competition for subsistence resources.
- **Timber Harvest and Development:** On Prince of Wales Island, clearcuts change the recreation experience. Furthermore, habitat loss from these harvests is directly linked to declining deer populations across the forest, which are a vital food source for rural communities.
- **Enforcement and Cultural Protection:** There is a noted lack of Forest Service presence, leading to unauthorized use of reserved cabins and motorized violations in non-motorized zones. Additionally, there is an urgent need for management to require

explicit consent before allowing commercial use in areas of high Tribal or cultural significance.

Opportunities for Management Reform

Participants identified several high-impact ways for the Forest Service to better serve local communities:

- **New Infrastructure and Maintenance:** Overwhelmingly, respondents asked for the Forest Service to simply build more recreation infrastructure to handle increases in demand, and to maintain current infrastructure like cabins and trails up to the agency's own standards.
- **Trail Connectivity and Loops:** Rather than new developments, focus on missing links to connect existing trails and cabins. Creating loop systems would provide more diverse experiences for locals and help disperse commercial traffic.
- **Local Maintenance Partnerships:** The Forest Service should move toward paid service contracts with local non-profits and boroughs, which are often more efficient at cabin and trail maintenance than the centralized agency.
- **Climate Adaptation:** As glaciers recede and snow levels change, the agency must pivot toward emerging markets like guided bear viewing and proactively manage the post-glacier tourism reality at sites like the Mendenhall Visitor Center.

Geographic Distinctions

Attitudes towards tourism and recreation management varied between established hub communities like Juneau, Ketchikan, and Sitka, compared with other more remote, less populated communities. Hub communities tend to have a lot more resources, making them less dependent on the Forest Service, whereas smaller communities rely heavily on the FS to build infrastructure and drive their economies.

- **Hub Communities (Juneau, Ketchikan, Sitka):** Respondents noted these communities are at their capacity for visitors, the FS needs to help mitigate negative outcomes. Management here must focus on capacity limits, zoning to separate types of recreation, and mitigating the impacts of high-volume tourism. For example, Juneau experiences conflicts with commercial tourism, leading to community members feeling pushed out. Specifically during the winter, recreation conflicts exist between motorized and non-motorized users..
- **Rural Communities, POW Island:** Management here must focus on protecting subsistence resources, deer and fish, and ensuring that any increase in tourism directly supports local prosperity rather than extracting it. Many of the smaller communities look to the Forest Service to help usher in a new era of recreation and tourism based economies. For example, the landscape of POW Island has been shaped by logging. This development has been detrimental to deer habitat as well as trail and cabin viewsheds, impacting locals and visitors alike.

Conclusion

We believe that these comments (attached as 220 geospatial data points), are reflective of common themes we have heard in our work in the region. Along with our report for the Assessment phase, the State of Recreation Report, we believe that these offer a good starting point for understanding the needs for recreation in the Tongass. The overarching theme of our outreach is a desire to protect the qualities that make Southeast Alaska unique. Whether it is ensuring a hunter can find deer, a local family can find a quiet beach, or a small business can lead a sustainable tour, the Forest Service must transition from a timber-first agency to a partnership-driven recreation manager.

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EIS Scoping Recommendations

The Tongass National Forest is a world-class recreation and tourism destination that generates substantial economic benefits for Southeast Alaska communities. The outdoor recreation and visitor economy is the region's largest economic driver and uniquely reliant on the Tongass. We recommend that the Forest Service undertake the following analyses as part of this plan revision:

1. Collect Comprehensive Economic Data on Recreation and Tourism

The Forest Service needs a rigorous understanding of how the Forest supports the biggest economic sector in the region. The Forest Service is required to do economic analysis as part of the EIS, and this should include analysis of local and commercial recreation. We recommend commissioning an independent economic study quantifying the direct and indirect economic contributions of recreation and tourism on the Tongass National Forest, including:

- Annual visitor spending (lodging, food, transportation, equipment, guided services)
- Regional Jobs supported by recreation and tourism activities (seasonal and year-round)
- Tax revenues generated for federal, state, and local governments
- Economic multiplier effects throughout Southeast Alaska communities
- Analysis of the different types of tourism products offered and how the Tongass supports these activities.
- Trends in outdoor recreation participation and tourism growth in the region.
- Case Study: Analysis of specific FS investments and their associated return on investment for the agency and local economy.
- Outdoor recreation spending by locals associated with use of the Tongass resources.

- Comparative analysis of economic output and opportunity costs of Forest Service investments

Economic data on Tongass contributions to recreation and tourism is often too generalized, absent, or outdated. Current economic analysis suggests that outdoor recreation and tourism generate significant economic returns. Comprehensive, current economic data is essential for informed decision-making.

2. Compare Recreation Alternatives

Develop and analyze management alternatives that prioritize recreation and tourism outcomes, including:

- **The Forest Service needs to contemplate different options for managing tourism on the Tongass.** Given the explosive growth of tourism, major ports at capacity, and local concerns about sustainability, the Forest Service should get community feedback on diverse alternatives for supporting local and regional prosperity through tourism management. The agency should contemplate expanded large-scale opportunities in existing ports, concentrating tourism opportunities in port communities, encouraging outdoor recreation and tourism development in smaller communities, favoring smaller and local operators, or more noncommercial approaches. Given that this is the largest sector in the region, the Forest Service needs to consider a wide-range of alternatives, with the goal of identifying sustainable recreation management direction.
- **Develop a "Recreation Priority" alternative** that identifies and protects high-value recreation zones, scenic corridors, and backcountry areas and balances local uses with commercial tourism. This alternative should develop a regional strategy for managing tourism that gives deference to communities to determine their own future.
- **Develop a management framework for new large scale tourism developments in small communities** and adjacent to Forest Lands. This framework would guide how the Forest Service responds to demands for access, protect local and noncommercial uses, provide local economic opportunities, and balance other resource protection goals.
- **Detailed comparison of outputs** (recreation opportunities, employment, revenue, outcomes) for each alternative across a 20-year planning horizon.

- Each alternative should describe clear desired conditions and planning outcomes for recreation.

3. Study Viewshed Value and Visual Resource Management

Conduct a detailed viewshed analysis and visual impact assessment that includes:

- Mapping of high-value scenic viewsheds visible from major recreation sites, travel corridors, including small ship routes, air travel and flightseeing, and tourism destinations like lodges.
- Economic valuation of scenic quality and visual landscape integrity in terms of tourism demand and recreational value
- Guidance for visual resource management that prioritizes landscape aesthetics in key areas

- Assessment of scenic quality as a distinct forest value worthy of protection and management

4. Analyze the recreation landscape, opportunities and concerns about tourism growth

The agency needs to look at how commercial tourism and recreation are different. While the activities are closely related, the comments that we have heard show that locals are particularly concerned about the growth of commercial tourism.

- **Map the current recreation landscape.** The Forest Service should describe how the landscape is currently used by commercial tourism and local recreation users. The Forest Service has published data on average commercial tourism use, but should analyze local use as well. Consider how Tongass supports local hunting and fishing that feeds families, and how access to opportunities has changed.
- **Analyze recreation opportunities for each community, not just across the Forest.** Looking at recreation across the Forest as a whole is inappropriate given the island geography and remoteness of communities.
- **Larger port communities like Juneau are at their social capacity.** Individuals in smaller communities have expressed concern about becoming like the larger communities but also optimism about potential economic benefits.
- **Economic development opportunities**, consistent with community plans. The plan should describe how the FS will support recreation in all of the SE communities. Consider POW island, where cruise ship visits will increase from 6 calls in 2025 to 66 in 2026. How will new commercial recreation businesses move forward on FS lands? How will resident's experiences on the trail change?
- **Analyze the impacts of increased commercial use on non-commercial users.** How will the FS provide opportunities to avoid commercial use for locals around their communities? Have commercial tours permitted by the Forest Service displaced or decreased local recreation or subsistence activities?

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Plan Component Recommendations

In response to the U.S. Forest Service's Notice of Intent (NOI) to revise the Tongass Land Management Plan, the Tongass Recreation Partnership submits the following plan component recommendations. These recommendations serve as a direct evolution of our "Need to Change" analysis, providing a roadmap to modernize a management plan that has remained largely stagnant for nearly 30 years.

Since the 1997 Plan was established, Southeast Alaska has undergone a profound economic and social transformation. Tourism has surged from approximately 835,000 visitors in 1999 to over 2.2 million in 2025, yet the Forest Service's recreation management capacity has often failed to respond to this demand. While the regional timber economy has declined, recreation and tourism have emerged as the primary drivers of rural prosperity and community retention in Southeast Alaska.

The current management direction, rooted in the 1997 Plan and largely retained in the 2016 update, fails to anticipate or address the current volume of use, the retreat of iconic glaciers like the Mendenhall, and the deteriorating state of recreation infrastructure. To move from aspirational goals to a focused, functional reality, the Forest Service must undergo a fundamental cultural and structural shift in the Tongass.

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

1. Data Collection:

The Forest Service needs to collect good data on recreation and commercial use, the status of infrastructure, and measure economic impacts.

DC-REC-XX: The FS has accurate and timely data on recreation and commercial use, the status of infrastructure, and measures economic impacts to trigger and inform analysis and decisions. The data is accessible to the public and used by partners to inform decisions across jurisdictions.

DC-REC-XX: Recreation and Tourism management decisions, including those regarding Commercial Use Permits, new infrastructure, and maintenance prioritization, are consistently informed by accurate, timely, and collaboratively collected data on social, economic, and environmental conditions.

OBJ-REC-XX: Within two years of plan approval, the Forest Service shall establish a comprehensive, collaborative monitoring program to assess the social, economic, and physical conditions of forest-wide and high-use recreation settings. The program must establish and support metrics for the following annually: (1) **Commercial Use Capacity** (e.g., allocated versus actual use day/# of clients), (2) **Social Carrying Capacity** (e.g., visitor conflict, user satisfaction, user location), (3) **Infrastructure Condition** (e.g., backlog of cabin and trail maintenance using established FS standards), (4) **Economic Impact** (e.g., overall economic impacts of FS related commercial tourism and non-commercial recreation)

OBJ-REC-XX: Within two years of plan approval, the Forest Service shall publish a comprehensive regional economic impact analysis for recreation and tourism in Southeast Alaska. This analysis must utilize a multi-sectoral approach to quantify the total economic contribution of the recreation and tourism economy, including direct employment, indirect business-to-business transactions, and induced effects on local, state, and federal tax revenues. The report shall specifically evaluate the return on investment of recreation infrastructure as a primary driver of rural prosperity and regional economic resilience.

STD-REC-XX: To ensure transparency and facilitate shared stewardship, all collaboratively collected recreation and tourism data, including visitor use patterns, infrastructure conditions, and economic impact metrics, shall be maintained in a publicly accessible Geospatial Information System (GIS) portal. This portal must support open data standards to allow for integration into municipal, Tribal, and partner planning tools and shall be updated at least annually.

STD-REC-XX: The Forest Service shall not issue any new or renewed commercial use permits that would increase capacity in areas identified as exceeding desired social carrying capacity standards (as defined by the monitoring program in OBJ-REC-XX) until management actions are implemented to mitigate the overcapacity issue and monitoring data confirms the improvement.

GDL-REC-XX: Monitoring protocols should prioritize the integration of co-produced data from regional organizations, local governments, and tribal governments, and should utilize the best available science, including economic models that capture the full contribution of recreation and tourism to Southeast Alaska’s economy.

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.

DC-REC-XX Forest Service actively supports the commercial tourism sector and recreation users. Tongass leadership, District Rangers, and Recreation staff are resourced and engaged to address recreation and tourism management. Staff have clear direction and support to implement the recreation and tourism vision for the Forest.

DC-REC-XX: Southeast Alaskans own and operate recreation and tourism businesses that support and contribute to local, state, and regional communities and economies. Locally owned businesses are prioritized in permitting and management decisions.
DC-REC-XX: Commercial recreation and tourism businesses operate alongside and do not displace local noncommercial recreation and subsistence activities. Permitted commercial recreation and tourism uses reflect local community economic and sustainable recreation goals.
DC-REC-XX: Sustainable recreation and tourism on the Forest continue to be a significant economic driver in Southeast Alaska. As such, the Forest prioritizes recreation infrastructure development and maintenance investment.
DC-REC-XX: Forest Service leadership, staffing, and funding for recreation are stable and aligned with the scale of recreation demand, ensuring that recreation project priorities and execution are not dependent on the approval or implementation of timber or other resource projects.
OBJ-REC-XX: Recreation Demand Analysis: Within 2 years of plan approval, complete a Forest-wide analysis of sustainable recreation and tourism demand, by recreation use and facility type.
OBJ-REC-XX: Working with partners and stakeholders, within 3 years of plan approval, identify new recreation and tourism infrastructure facilities for development over the life of the plan to address the Recreation Demand Analysis.
OBJ-REC-XX: Advocate for budget adjustments to support recreation infrastructure development and maintenance yearly.
OBJ-REC-XX: To guide Forest Service decision-making on commercial tourism, within 3 years of the plan approval, each Ranger District develops a Community Tourism Plan for communities in the District, incorporating existing community tourism plans if available.
STD-REC-XX: Recreation and tourism infrastructure projects identified in community plans or the Forest Service priority list must be analyzed, implemented, and funded as standalone projects. The Forest Service shall not delay these priority recreation projects to bundle them as mitigation for timber harvest or other resource development activities.
STD-REC-XX: Each Ranger District shall maintain at least one dedicated Recreation and Tourism Staff Officer whose primary responsibility is the implementation of this plan's recreation components and community partnership coordination. This position shall be considered a core management function and shall not be left vacant for more than 120 days.
STD-REC-XX: In areas where carrying capacity thresholds are reached, new or transferred commercial use permits shall be prioritized for locally-owned businesses that demonstrate a commitment to local employment and regional economic contribution.

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.

DC-REC-XX: The Forest Service and the Tongass Recreation Partnership, local governments, Tribes, and key commercial operators work under formalized MOU's in each community, emphasizing shared stewardship of Tongass lands and infrastructure. Within these signed agreements, roles for recreation management, monitoring, and project development are clearly defined, ensuring goals are implemented despite potential leadership transitions.

DC-REC-XX: Forest Service projects are identified, refined, and implemented with annual community engagement in partnership with Tribes, municipalities, and local land management organizations.
DC-REC-XX: Tourism benefits rural prosperity through the Forest Service's prioritization of allocating 51% of special use permits to locally owned, small businesses consistent with community goals.
DC-REC-XX: Commercial recreation activities occur in areas suitable for commercial recreation based on direct feedback from Tribal governments and impact monitoring data to ensure that traditional cultural uses on the Forest are not impaired. Impairment is determined by Tribal governments.
OBJ-REC-XX: Forest Service rangers attend at least two public community meetings in their district annually. At the attended meetings, rangers shall be available to answer questions and engage with the general public. Minutes for this meeting must be recorded and published on a public platform.
STD-REC-XX: The Forest Service, prior to planning for future infrastructure and trail projects, must formally review all adopted municipal, borough, or tribal plans to ensure the project minimizes adverse impacts to community resources and is consistent with local needs for community well-being, services, and recreation offerings.
MA-REC-XX: The Forest Service meets with each community's city assembly and tribal council each year to participate in and support municipal and Tribal recreation and tourism planning efforts.
MA-REC-XX: The Forest Service builds a network of representative partners, including municipalities, tribes, trail-building organizations, and recreation users, to guide project development, prioritization, and execution.

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.

DC-REC-XX: The Forest supports trails of various lengths and difficulty levels in all communities that enable access to scenic vistas and wilderness.
DC-REC-XX: The Forest supports trail accessibility by ensuring all trails are marked and properly and consistently maintained to FS standards.
DC-REC-XX: Trails and recreation infrastructure meet community use needs, including recreation, traditional practices, and commercial tourism through annual maintenance and consideration of community input through annual meetings.
DC-REC-XX: Trail and Cabin crews are adequately trained, staffed, funded, and prepared to keep FS sites up to standard.
OBJ-REC-XX: Working with partners and stakeholders, within 2 years of plan approval, develop and implement a plan to address the Tongass Sustainable Trails Strategy project list for each ranger district. Include staffing and budgeting needs, project priority list, and timeline for project implementation and completion.
OBJ-REC-XX: Every 5 years, with partners and communities, use monitoring results to identify where trail conditions or use demands require trail maintenance priority and construction needs.

OBJ-REC-XX: Working with partners and stakeholders, develop and implement at least 2 new recreation or tourism infrastructure facility projects to address capacity issues or conflicts per ranger district every 10 years.
OBC-REC-XX: Annually report on progress towards accomplishing the goals outlined in the Tongass Sustainable Trails Strategy by Ranger District.
OBJ-REC-XX: With partners and stakeholders, maintain to standard 80% of all non-motorized trail miles annually.
OBJ-REC-XX: Within 10 years of plan approval, eliminate recreation and tourism infrastructure facility maintenance backlog. Each year, the Forest carries no more than 15% percent maintenance backlog.
OBJ-REC-XX: Within 5 years of plan approval, the Forest Service shall identify and prioritize connecting link projects that turn existing out-and-back trails into loops or connect trails to existing road systems to increase user capacity without requiring new remote infrastructure.
MA-REC-XX: Utilize fee structures and agreements with commercial recreation and tourism operators to address recreation and tourism infrastructure facility maintenance priorities and achieve recreation and tourism plan components.

5. Zone and Manage Recreation and Tourism.

Utilize zoning tools and permitting to outline specific, area-based management strategies and goals.

DC-REC-XX Recreation and tourism users in each community are able to access scenic, natural, and undeveloped areas with viable populations of wild salmon, deer, bears, and other wildlife and game for sustainable recreation.
DC-REC-XX Recreation and tourism users experience minimal conflict between different user groups. The tourism industry is able to grow while still finding uncrowded trails and wild places to take clients without compromising the broader ecological integrity of the Forest. Recreation users continue their activities without encountering increasing numbers of commercial users.
DC-REC-XX FS staff have the expertise, direction, and funding to manage recreation and tourism use effectively on the landscape.
STD-REC-XX: Limit commercial recreation group size to two groups of twelve persons per day in congressionally-designated Wilderness Areas.
STD-REC-XX: Limit commercial recreation group size to [XX] persons per day in LUD II land use allocations.
STD-REC-XX: Maintain opportunities for commercial tourism in non-conservation areas such as general forest and timber-based LUDs.
GDL-REC-XX: To support the local economies of Southeast Alaska, ensure the majority of permits are issued to local companies with predominantly local employment.
GDL-REC-XX: To achieve sustainable recreation and tourism, Desired Conditions and Objectives, consider establishing per-day or per-hour use limitations at high-demand recreation infrastructure facilities to limit overcrowding at these sites.
GDL-REC-XX: In making permitting decisions, including establishing group size and temporal restrictions, the Forest should utilize existing community and Tribal recreation and tourism management plans.

6. Keep Alaska Awesome:

The Tongass National Forest supports outstanding world-class recreational opportunities; we want to see these opportunities continue.

DC-REC-XX: Communities in and visitors to Southeast Alaska have sustainable access to world-class outdoor recreation opportunities, including hunting, fishing, hiking, camping, skiing, backpacking, and other pursuits. Vast scenic landscapes, abundant fish and wildlife populations and habitats, and diverse sustainable recreational opportunities are enjoyed by Southeast Alaskans and visitors alike. Multiple-use resource development and commercial tourism activities do not impair recreation opportunities or subsistence activities.
DC-REC-XX: Sustainable recreation and tourism on the Forest continue to be a significant economic driver in Southeast Alaska. As such, the Forest prioritizes and invests in sustainable recreation infrastructure development and maintenance in coordination with communities and stakeholders.
DC-REC-XX: Noncommercial recreational facilities are uncrowded, and reservations are generally unnecessary. Recreational infrastructure, including rental cabins and other facilities, is available for local and visitor use. Where appropriate, new facilities are constructed. All recreational facilities are maintained and support sustainable recreational use.

Plan Monitoring

The aforementioned plan components represent a transformative vision for the management of recreation and tourism in the Tongass National Forest. However, for these goals to move beyond aspirational language and into functional reality, they must be supported by a rigorous system of accountability. The past plan included limited and vague monitoring, often resulting in no action being taken to rectify major issues with recreation and tourism management strategies. It's crucial for the monitoring framework of the new management plan to create a closed-loop system where management is continuously refined based on real-world conditions and community feedback.

The Tongass Recreation Partnership has drafted a monitoring framework that links monitoring questions directly to the plan components we've recommended. The framework must include a feedback loop, which ensures that if desired conditions and objectives are not being met, the agency undergoes meaningful change to reverse that trend. The following table defines the key performance indicators, monitoring questions, and feedback mechanisms necessary to hold the Forest Service accountable to the goals of the plan:

Recreation and Tourism Monitoring Questions	Sampling/ Reporting Period	Indicators	Data Sources	Feedback Mechanism
MONT-REC-01 **(All)**: What is the status and trend of recreation and tourism use across the Tongass, and is FS management keeping pace to sustain community benefits, infrastructure capacity, and adequate resource allocations?	Every 2 years, with annual internal updates.	Change in annual visitation and commercial use by type; % of trails/cabins meeting standards; maintenance backlog ratio; local spending; overcrowding/conflict zones.	NVUM; commercial use permits; partner trail reports and surveys; Vessel tracking data; local tourism data; INFRA Trails Database	Biennial Monitoring Evaluation Report; if backlog or crowding worsens for 2 cycles, trigger Management Review with partners and Tribes, increase budgeting for recreation
MONT-REC-02 **(Collaboration Framework)**: Are FS collaboration and partnership practices effectively supporting community, Tribal, and cross-jurisdictional recreation and tourism goals?	Every 2 years, aligned with recreation data updates.	Quantity and quality of partnership agreements; partner satisfaction; jointly implemented projects; consistency across ranger districts; Participation in local planning efforts and community meetings	Partnership agreements; Adherence to collaboration framework; FS project records; partner satisfaction monitoring program	Biennial report; if satisfaction or partnership levels drop >10% for 2 cycles, trigger Collaborative Review Session with community and Tribal partners. (or TRP)
MONT-REC-03 **(Build Trails)**: Are trail systems maintained, improved, and expanded in line with community priorities and sustainable capacity?	Annual data collection; 5-year comprehensive review.	Miles of trail maintained to standard; miles of new trail built/improved; % of maintenance backlog addressed; # of priority projects completed; partner contributions.	INFRA Trails database; partner maintenance reports; Sustainable Trails Strategy tracking; FS budget data.	Annual report: if backlog increases or <80% of target trail mileage is not maintained, trigger Trail Infrastructure Adjustment Review to reprioritize projects and resources. Request a budget increase if goals are not being met with current resources.

MONT-REC-04 (**Zone/Manage Recreation/Tourism**): Is tourism growth distributed and managed sustainably across the Forest, without displacing local recreation or traditional uses?	Every 3 years.	Change in visitation by area; ratio of commercial to local use; # of access conflicts; % of LUDS (or other zoning) meeting desired use balance.	NVUM; commercial permits; feedback at community meetings; FS field monitoring; feedback from partner organizations, municipalities, tribal governments	Biennial report; if REA (or other zone) exceeds the target commercial ratio or conflicts rise, initiate Zoning and Capacity Review for the affected area.
MONT-REC-05 (**Assign Management Priority)**: Does FS staffing, funding, and leadership capacity align with the stated priority of recreation and tourism management?	Annual budget and staffing cycle.	Recreation staff FTEs by district; % of FS budget allocated to recreation; vacancy duration; turnover in recreation positions.	FS HR data; regional budget reports; staffing dashboards.	Annual summary: if staffing/funding is insufficient to address stated recreation objectives for 2 years, require Leadership Accountability Review, corrective staffing plan, and request budget increase for recreation staff and projects.
MONT-REC-06 (**Data)**: Are data collection and monitoring systems sufficient to guide adaptive management for recreation and tourism?	Annually	% of required datasets collected and updated (NVUM, use permits, mobility data); availability of geospatial data; frequency of sharing; # of adaptive actions informed by data.	FS data systems; NVUM; mobility/AIS datasets; partner webmap analytics.	Annual review; if datasets are not updated or shared in >1 year, require Data Modernization Plan and schedule for partner access.