



Sitka
CONSERVATION
SOCIETY

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Protecting the natural environment
of the Tongass National Forest and
supporting the development of
sustainable communities within
Southeast Alaska

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Submitted Via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=64039>

Sitka Conservation Society Comments on Draft Plan Content and Proposed Management Areas

On behalf of the Sitka Conservation Society (SCS) and our more than 1,000 members from Sitka and Southeast Alaska, we submit these comments in response to the Draft Plan Content and Proposed Management Areas released by the Forest Service for the revision of the Tongass National Forest Plan. SCS was founded in 1967 with the dual mission of protecting the natural environment of the Tongass while supporting the development of sustainable communities in Southeast Alaska, and we have engaged in every major phase of Tongass forest planning since. We appreciate the opportunity to participate in this process, and we respectfully submit the following comments.

We have attempted to make substantive comments to improve the draft plan content available; however, many of our comments hinge on the fact that there is not enough clarity in the draft plan content to make meaningful comments. Nor is it clear how previous comments submitted on the Notice of Intent have been incorporated into draft plan content, given that these comment periods were back to back with each other. This process is moving fast, without clear explanation of how feedback from the public, Tribes, and municipalities is being integrated into draft content. We are concerned that there will be no opportunity to comment on the final need to change, upon which the rationalization for the entire plan depends. Decisions made in this planning process will shape the landscapes, watersheds, fisheries, economies, communities, and way of life of Southeast Alaskans for the next fifteen or more years. The stakes could not be higher for the communities that depend on the Tongass and the integrity of the ecosystem

services that the forest provides. We recommend that the Forest Service slow down this process and release a final 'need to change' and preliminary draft content that demonstrates how community input has been incorporated before moving to the draft environmental impact statement.

Our substantive comments about draft plan content and proposed management areas are below.

Section 1: About the Tongass National Forest

The introductory paragraph notes that old growth trees are highly valued for specialty wood products, in addition to their social, ecological and spiritual values. It should also be noted that the large old growth trees are also valued for tourism. People come to see the forest and experience the old growth forest for aesthetic reasons, spiritual reasons, as places for hunting, hiking, exploration and to experience the large intact forests that exist in few other places across the nation. Many tourism communities have carving sheds or areas where tourists can watch master carvers and apprentices work on carving totem poles, which also use these old growth trees. The cultural use of old growth trees and the associated value to tourism should be noted in the introductory paragraph.

We appreciate the recognition of fisheries as a critical economic driver for the region in the draft plan content - a recognition that was missing in the notice of intent. More should be said about the specific role that the Tongass plays in producing the fish that sustain the wild Alaska salmon fisheries and the high percentage of those fish that are derived from the Tongass National Forest. The streams, rivers, and lakes are critical for that salmon production, which equates to jobs and economic return. The desired future condition of all lands on the Tongass should be that they continue to produce salmon and that runs are enhanced and restored so that they produce or exceed traditional levels of salmon production. Many areas have been impacted by past logging activity, road building, mining, and other human activities and are in need of restoration; also, there are opportunities for fish-passage investments that can open new stream areas for salmon production.

NEED TO CHANGE

We understand that the agency believes that their fisheries direction is already working, the watershed restoration strategy is adequate, and implementation challenges or funding concerns do not necessarily belong in the draft plan content. Therefore, there is no 'need to change' provided for the agency's strategy for managing or improving fisheries resources on the Tongass. However, we continue to reiterate that there is a 'need for change' related to how the Tongass is managed for its wild salmon production capacity. Right now, the value that the

salmon produced on the lakes, rivers, and streams of the Tongass National Forest provide to commercial, sport, and subsistence fisheries, community wellbeing, tourism and recreation, and ecological function, are not adequately measured, accounted for, reported on to Congress, or even considered a 'key ecosystem service'. This lack of attribution of value is a huge gap that plan content needs to address. The outcome we want to see are the following:

- Tongass Forest Service staff understand that salmon are a top economic contributor produced by the Tongass National Forest
- Management decisions - both active or passive - have an impact on salmon production
- The rest of the nation and Congress understand the economic, social, cultural, and ecological value of managing the forest for salmon production
- The amount of salmon generated by the Forest is communicated in terms of dollar value (ex vessel landings), jobs created/supported, community economic impact, harvest replacement value, etc

We request that the Forest Service include a top need to change item that seeks to rectify this gap between the value of salmon-producing watersheds and the management activities talent to steward them by setting measurable targets, such as 'increasing fish carrying capacity in community road connected watersheds' by installing fish ladders or repairing culverts or roads, or simply setting a goal for number of culverts blocking fish passage to repair each year.

The economic importance of salmon to Southeast Alaskan communities must not be underestimated or subsumed to other forest products; salmon should be a dominant use that other resources must 'mitigate around' or needs to at the very least be co-optimized with other resources on national forest system lands. This 'Need to Change' would align with the recent creation of the USDA Office of Seafood and the Executive Order 14276, "Restoring American Seafood Competitiveness."

We support the focus on shared stewardships and partnerships, increased consideration of subsistence uses and needs, and the integration of traditional ecological knowledge and local knowledge into decision-making.

FORESTWIDE DIRECTION

Aquatic and Terrestrial Ecosystems (ECO)

- These need for change items are good, and we appreciate the acknowledgement of increasing temperatures and precipitation patterns in the description.

- We request addition of a desired condition that management actions, such as increased stream buffers, may be taken to ensure intact riparian areas if increased flood events impact riparian habitat and stability.
- We support a standard of 300' buffers on all salmon streams in the Tongass, as is common practice in the Pacific Northwest to protect water quality, buffer functions, and fish production

Climate-driven natural disasters, geohazards and landslides

We find the proposed plan content around managing the Tongass in relation to climate-driven natural disasters, geohazards and landslides to be incomplete.

- There is no mention of management activity impacting landslides that are triggered by extreme precipitation events, or the climate-driven hazard increases that are already happening and will continue to increase in propensity and size. Although the Climate section does acknowledge the anticipated trends regarding precipitation and changing snowpack, acknowledging trends is not the same as connecting this information to management of activities that lead to increased climate change and/or reduced adaptation, such as large scale timber harvest of old growth forests.
- Landslides are increasingly threatening communities, personal property, and the health and safety of individuals. These events have scarred communities across the region due to loss of life, including in Sitka. The landslide and geohazard direction in this plan content is framed around ecosystem productivity, downstream fish habitat, etc - but not the real risk to human communities from logging and roadbuilding in landslide-prone terrain. Landslide risk is driven by a combination of factors, such as slope gradient, soil type, bedrock geology, proximity to Class IV channels, vegetation removal, and road drainage - but there is still minimal direction on these factors given the increased risk of climate-driven geohazards. The standard that roads and landings should avoid landslide-prone areas "where feasible" does not provide an actual direction for avoiding destabilization of a slope. Feasibility is often defined in terms of economic feasibility, not health and safety for a community - this needs to be clarified and rectified. Landslide hazard modelling should be updated and applied in project planning - the agency should require the research they conducted to actually be incorporated into tools used to govern decision-making.

Old Growth Forests

- Goals (FW-OGF-G) 01 Old-growth red and yellow cedars of cultural wood quality are maintained and available in a sustainable quantity that supports tribal cultural and heritage uses
 - This should be a desired condition, and it should specify “supports tribal cultural and heritage uses over a 400-600 year timeframe”

Poorly Drained Forest (PDF)

There have been timber harvests on many poorly drained forests across the Tongass during pulp mill logging. Site productivity is very low in these areas and the forests that grow back will grow slow and be stunted. Low productivity areas should not be harvested again through second-growth rotational forestry because they are not suitable for productive forestry. Old growth harvest should not take place on low productivity sites on poorly drained forests because of productivity issues. Only selective harvest for cultural use trees should occur on these sites. No timber harvest for export out of the region should occur on these sites, and absolutely no harvest for timber export outside of the country should occur on any poorly drained forests.

Partnerships and Shared Stewardship (PTSP)

FW-PTSP-DC-O2: The Tongass provides opportunities for educators in local communities to learn about local natural resource issues and to develop partnerships to deliver place-based outdoor learning opportunities.

We appreciate the desired conditions named in the PTSP section that (01) partnerships support natural resource protection, restoration, economic development, and employment/training opportunities within local communities, as well as (02) the Tongass provides educators in local communities to learn about natural resource issues and place-based outdoor learning opportunities.

The partnership and shared stewardship draft plan content could be strengthened through the following additions.

- Desired Condition: “Shared Stewardship requests from Tribes and the State of Alaska are evaluated on an objective rubric for how the activities proposed in the agreements achieve or work towards the CEDS priorities for the region.”
 - The State of Alaska has just signed a 20 year shared stewardship agreement with the agency, while Tribes that have submitted shared stewardship requests have still not seen follow through on their agreement proposals, despite having other forms of agreements with the forest service and demonstrated track records of

creating local jobs and economic outputs on the ground. There should be an objective rubric to rectify this perceived preference towards State requests instead of those submitted by federally recognized Tribes.

- Desired Condition: “The Tongass provides opportunities for agency staff to conduct workforce development learning opportunities with local educators regarding natural resource management, land and water stewardship, traditional Alaska Native values, cultural traditions and practices.”
 - One example of what we would like to see more of is the cultural use wood identification training that was hosted by the Hydaburg Cooperative Association and the Organized Village of Kasaan for Forest Service timber cruisers and silviculturalists in 2021¹.
 - We would also like to see the agency working more closely with high schools and the university to identify local workforce needs, create workforce development learning opportunities for the aforementioned topics, and publicize the opportunities for ANILCA hiring to local students in order to create local jobs.

Recreation and Tourism

We appreciate the acknowledgement that recreation is a key ecosystem service of the Tongass National Forest, given its economic impact, importance to local communities, and its role as a catalyst for public stewardship.

- In the specific need to change there is a bullet point stating: “Greater integration of recreation and access to recreation (roads) into other management activities, decisions.” We encourage the agency to think beyond the roads that are created for timber harvest that end at clearcuts or ‘managed stands’. Roads should also lead to recreation assets like trailheads that access subalpine, or trailheads at old growth forests. Roads that end at clear-cuts are dead-ends and don’t access places that recreationalists want to visit, nor where guides want to take clients.
- The agency needs to be more innovative on how to meet recreational needs and strategic in how their investments in roads for timber management, power generation and access, and other infrastructure can serve multiple needs and create multiple outcomes. Examples of this can include maintaining access on roadies used for power generation and access that are also used by recreationalists, such as the Blue Lake Dam

¹ <https://sustainablesoutheast.net/monument-trees-and-cedar-stewardship-on-the-tongass-national-forest/>

road in Sitka. This road is used by kayakers, sport fishermen, hikers, and many others, but it is apparently being discussed to shut down the public access to this road.

Developed Recreation (DVREC)

- FW-DVREC-DC-01: this should include reference to using local materials where possible; specifically, utilizing local young growth lumber in cabins, woodsheds, outhouses, and other developed recreation site updates supports local economic outcomes while helping to achieve USFS goals. Good examples of this are the young growth cabin at Starrigavan in Sitka,

Renewable Energy

- Renewable energy generated from fish-friendly hydropower on the Tongass National Forest is critical for the economic wellbeing of Southeast Alaskan communities and the energy security of our communities, which are highly vulnerable to price shifts from volatile global oil and gas markets. We recommend creating a metric for megawatts of renewable energy generated from the Tongass to report to Congress as an element of national security and energy independence.
- It should be noted that biomass as an energy source is a byproduct of timber operations and that growing trees for biomass in Southeast Alaska is not economically feasible.

Scenery

- Clearcuts that are visible from marine corridors and flyovers are a detriment to the visitor experience of the world class guided recreation and tourism opportunities offered on the Tongass. Visitors do not come to the Tongass to see clearcuts.

Socio-Economic Management:

- The need for change items under this section are ambiguous and unclear, and could be used to justify contradictory management actions.
- “Integrating concepts of local economic and cultural sustainability within timber management direction” should focus on the long-term management of cultural use wood, the use of thinning prescriptions to improve wildlife habitat, and supporting a community-centered wood products industry. It should not be used as a justification to continue providing large scale old growth timber sales or export sales to sustain a ‘timber culture’ in Southeast Alaska, given the negative impacts that these practices have on other local cultures and identities. Old growth timber harvest is not “economically sustainable” given that the wood being harvested is only able to

regenerate of a similar quality on a 600 year timescale, and the agency lacks the ability to plan effectively on this time scale

- Renewable hydropower also deserves a mention in this section, as it is critical to the social and economic sustainability of many communities on the Tongass. The hydropower facilities that are fed by glaciers, icefields, mountains, and watersheds on the Tongass are an ecological service that have an equal corresponding economic value. Communities with cheap, abundant hydropower from the Tongass experience higher rates of economic development and will be increasingly attractive to business development given the rising cost of nonrenewable fuels and electricity in general.

Timber

- Under the second need to change item: “Update lands suited for timber production, to account for current land ownership, updated vegetation data, and improved modeling processes,” we request that the Forest Service calculate and include a section in this chapter that articulates the amount of suitable timber lands that were transferred out of Forest Service ownership from the Sealaska Lands Selection bill in 2014 and the Mental Health Land Trust Transfer in 2017, and quantifies the impact that transferring ownership of these “high value and highly productive timber stands” has had on the ability of the Forest Service to produce timber sales of that value. These land selections included the best remaining old growth stands for harvest, and the transfer of these lands into private/state ownership has had a measurable and meaningful impact on the agency’s ability to offer attractive and economically viable timber sales.
- Under Timber production (TBRP): “Unless prohibited by other plan components, timber harvest may occur on lands unsuitable for timber production to meet other resource objectives.” This does not improve clarity or remove conflicting guidance within the plan, and therefore does not meet the first stated ‘need to change’ rationale to update and improve the plan for clarity. We request specific examples of what this authority would look like in practice.
- *Table 13: Analysis of Tongass National Forest acres to identify acres suitable for timber production with consideration of 2001 roadless rule areas:* The agency should base the analysis of land suitable for timber production on the actual site index, site productivity, existing infrastructure, ability to build infrastructure, forest characteristics, soil and slope conditions, place on the landscape, and other physical and natural characteristics instead of the plan components, LUDs, Roadless policy, etc..... These are human classifications for lands, and they do not equate to these lands being good for forestry and timber harvest. When the agency puts out numbers like “2.6 million acres are

suitable for timber harvest without the Roadless Rule,” they are setting themselves up for failure and the public up for misunderstanding, because the reality is that the vast majority of those lands do not have productive forest, are not in areas where timber harvest is economically feasible, and do not have trees that have value and/or are not sites where rotational forestry makes sense. The Forest Service needs to grapple with this reality and plan for realistic working landscape circles based on the actual conditions on the ground, the realities of the industry in Southeast Alaska, the existing built infrastructure, and the locations where merchantable second growth will exist.

- This specifically relates to FW-TBRP-DC-05 “Seek to provide a supply of timber from the Tongass National Forest that meets the annual and planning-cycle market demand.” The Forest Service should figure out how much timber the lands that are actually suitable for timber production can produce on a sustained yield basis, and not try to produce timber to meet an arbitrary market demand that is detached from the reality of what the forested landscape can produce. Even though the Tongass is an extremely large forest, there are very limited areas where timber harvest and management is actually economically feasible and where site conditions allow for forest growth for rotational forestry or stands growing back forests within a reasonable time scale - especially when existing industries have created specialized niche markets for 800 year old trees, when those trees are exceptionally rare across the landscape.

POTENTIAL ACTIVITY SPECIFIC PRELIMINARY DIRECTION

Subsistence Management

- We support the Forest Service’s intent to go above and beyond the simple direction to line officers to ‘implement ANILCA’ and provide them with practical steps on how to do so. However, we are concerned that the wording ‘consider effects’ to subsistence resources does not accomplish this goal; if subsistence resources and habitat are to be prioritized, it must be stated to ‘prioritize management activities that improve subsistence habitat’ and ‘prioritize mitigating impacts of management activities on subsistence harvest’. ‘Consider’ is a weak verb that does not have any actual shift in behavior required, as opposed to the direction in this plan content provided to prioritize regional/local economic prosperity

Timber Harvest Management (p 99)

- Young Growth Stands: Any harvests of young growth in beach buffer stands should improve old growth conditions and habitat conditions. Prescriptions and treatments

should only be 10 acres in size if it can be shown that they accelerate a return to old growth conditions and will shorten the time that these areas return to conditions that support beach buffer habitat needs for deer, bear and other wildlife. Visual considerations and scenery quality should also be taken into account. Beach buffer habitat is extremely important and sensitive and any treatments absolutely need to prioritize habitat improvement rather than timber volume metrics.

- “Harvest of old-growth timber across the Tongass is allowed for cultural trees, such as for totem poles, canoes for example, but harvest for these uses does not contribute to the projected timber sale quantity.” We assert that cultural use trees **should** count towards sale quantity and the social/economic value of cultural use trees and the carving arts economy should be considered and managed for. This correlates directly with the identified Need to Change of “integrate local economic and cultural sustainability” under the Timber and Socio-economic sections.
 - This would ensure that the agency plans for a continuous supply of cultural use wood for current and future generations. Right now, cultural wood requests are accommodated on a one-off basis, not anticipated and managed as part of a sustained program. Incorporating cultural wood into the PTSQ would require the agency to inventory cultural wood resources, forecast demand from future carvers and communities, and design a program to supply it reliably. Whether these actions are accomplished through a separate cultural tree strategy or the PTSQ, the fact remains that current ‘one off’ is inadequate and the rate at which the trees with totem-qualifying characteristics are being commercially harvested on the Tongass for export requires an immediate solution.
 - This would also provide actual backing for the very real economic impacts of the Alaska Native arts and carving economy - if cultural use volume is factored into PTSQ, it follows that the access needs of Tribes and ANCs should be incorporated into road planning, sale area selection, and timber sale contract design from the beginning, so that these rare trees are not included as part of commercial sale areas to other operators. Although by no means can it be comprehensive, given the invaluable cultural heritage it represents, there are absolutely methods to calculate the economic impact of purchasing and transporting a lot, hiring master and apprentice carvers, hosting a totem pole raising ceremony in a community, using Alaska Native carving traditions and art as tourism marketing tools, and tourism visitation to totem parks. This economic data must be included in Forest Service analysis and the plan content itself.

- It is a critical need to change from the current forest plan that the Forest Service create a proactive, sustained program for cultural wood management. The plan must not just “evaluate for cultural trees before commercial sales”, it must require that those trees go towards cultural uses, or are left standing for future cultural uses.
- “Evaluate the presence of cultural trees before commercial timber sales” does not do anything to commit the agency to require that trees meeting cultural use specifications are indeed used for this purpose. This desired condition is simply a notification before logging, not a meaningful restriction or regulation to promote or increase access to cultural use wood by requiring first claim for Tribes or ANCs to these trees or requiring commercial sale redesign to leave them standing for future cultural use.

MANAGEMENT AREAS

- Key Fisheries Watersheds:
 - Harvesting old growth does not lead to more productive fisheries habitat; it damages riparian areas, destabilizes stream and riverbanks, increases stream temperature and reduces oxygen and nutrient uptake. It is possible that the Forest Service mistakenly wrote ‘old growth’ when they meant to write ‘young growth’ timber harvest is suitable in this management area. If the agency wants to ascertain that old growth timber harvest improves fisheries habitat, they should provide robust citations and examples of what this looks like on ecosystems similar to the temperate rainforest of the Tongass.
 - Classifying ‘key fisheries’ watersheds as the only specific management area (outside of general forestwide direction) as ‘suitable for timber harvest’ also begs the question of what the utility of this management area is, given that old growth timber harvest specifically does not align with aquatic ecosystem habitat protection
 - It is unclear how key fisheries watersheds were determined, and it is uncertain that those identified on the proposed maps are ‘key fisheries watersheds’ at all given that in the Need to Change and NOI, these areas were called ‘key conservation watersheds.’ Were there any changes to the watershed identification methodology that occurred between that change, that differentiated between watersheds that might be key for conservation versus those that are key fisheries watersheds?

- There are key fisheries watersheds in the Sitka Ranger District that are extremely well functioning, and should be designated as such to protect these values and to elevate the metrics and socio-economic impact of fish production, such as Redoubt Lake area and watershed. There are also key fisheries watersheds that are degraded, are contaminated, and/or need culvert replacement and restoration to return to prior fish production levels, such as Klag Bay. This area is also a 'key fisheries watershed' for subsistence fishing, but does not have the productivity of other key fisheries watersheds.
- There should be a distinction between key fisheries watersheds that are working well and need to continue to be managed for fish production, and key fisheries watersheds that are degraded and need to be prioritized for restoration work. This work should address failing culverts, road decommissioning or aquatic organism passage improvements, fish ladders, and the installment of large woody debris in streams and rivers to reduce sedimentation runoff and improve fish habitat. Limited young growth timber harvest *only* may be suitable in these areas to improve riparian function and wildlife habitat.
- There should also be a recognition that climate change may shift where key fisheries watersheds are or production levels within existing ones. It is critical to protect cold water bays and rivers at the head of inlets to provide climate refugia to salmon species as precipitation and temperature levels continue to fluctuate.
- Community Use Management Area
 - We appreciate the intent of community self-determination in this management area, but it is too vague to be useful at this time. How will the agency determine what constitutes each community's 'way of life', as well as economic, social, cultural needs and values? What kinds of plans, resources, and studies will be used to inform the agency as they evaluate this? How will a sense of continuity be ascertained for longer-term projects and planning, outside of each community's municipal and tribal government election cycles? How does *coordination* relate to collaboration or shared stewardship on surrounding lands?
 - We recommend specifying how the agency will use a community's existing strategic plans, comprehensive plans, transportation plans, economic development plans to guide community priorities, as well as direction from the municipal and tribal governments
- High Commercial Recreation Use Area and Low Commercial Recreation use area

- The issue with providing any kind of substantive comments on these proposed areas is that there is no definition provided that distinguishes high commercial use from low commercial use recreation areas. What is the level at which low use becomes high use, and what constitutes large versus small commercially guided groups? These distinctions may also vary by community, given the extremely low tourism numbers of some communities and the disproportionately high numbers of cruise ships and tourists in other areas. Providing clear definitions and levels is critical for informed public engagement on this management area.
- Tourism expansion has been extremely contentious in Sitka and has been managed over the years of explosive growth through the development of deliberate protocols, policies, and practices, informed by entities like the municipal assembly, Planning Commission, the Short Term Tourism Task Force, the Tourism Commission, etc. SCS does not support designation of any areas in the Sitka ranger district, especially on Kruzof Island, as ‘high use recreation and tourism’ until there is more information available about what these levels would be, so that the community can accurately analyze whether the proposed location is suitable.
- SCS does not support high commercial use designation on Kruzof Island, and especially at Shoals Point. We support the administrative designation of Southern Kruzof Island as a special interest area, which should be “protected for their unique scenic, historical, geological, botanical, zoological, or paleontological characteristics.” These areas are managed primarily for public education, interpretation, and recreation in their natural state; however, this does not mean that they are managed to MAXIMIZE recreation, as the primary goal is protection of the unique characteristics of these areas. There is a critical distinction between *managing for* recreation and *maximizing* recreation opportunities. Southern Kruzof is the site of the Mt Edgecumbe Volcanic field, a unique geological feature that is undergoing continual research regarding past and potential for future volcanic eruptions². Furthermore, Southern Kruzof is not just a recreation site, but an important subsistence harvesting site for Sitkans. These values would be damaged via the creation of large-scale tourism infrastructure or increased developed recreation opportunities.

A note on the potential for **geographic management areas**: this concept is interesting and could provide more grounding in community priorities and management foci. However, we are wary

²<https://www.usda.gov/about-usda/news/blog/buried-forest-alaskas-kruzof-island-window-past#:~:text=Southern%20Kruzof%20Island%20consists%20of,to%20more%20than%203%2C200%20feet>.

that focusing on the specifics of each geographic area (for example, each island/group of islands) will result in management that does not take into account region-wide ecosystem health or conditions. This organization of management areas would also need to intensely integrate climate change considerations to account for species migration and the habitat necessary to support these adaptations.

Thank you for the opportunity to comment. We look forward to continued engagement in this process and to working with the agency to help develop and implement management activities and investments that serve the people of Southeast Alaska, the nation as a whole, and that conserve and protect the ecosystems and natural beauty of the Tongass temperate rainforest for generations to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Riley', with a long, sweeping flourish extending to the right.

Katie Riley
Deputy Director, Sitka Conservation Society