FSEEE Forest Service Employees for Environmental Ethics

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To: Tongass Plan Revision Team, USDA Forest Service

Via: Electronic Comment Portal

Subject: Comments on the Preliminary Draft Plan Content for the Tongass Land Management Plan Revision (Project #64039)

To the Tongass Planning Team:

I am writing to provide formal feedback on the preliminary draft content for the Tongass Land Management Plan (LMP) revision. These comments supplement our comments previously submitted on March 20, 2026.

To ensure the revised plan meets the substantive requirements of the 2012 Planning Rule (36 CFR 219), the National Forest Management Act (NFMA), the Alaska National Interest Lands Conservation Act (ANILCA), and the Multiple-Use Sustained-Yield Act (MUSYA), the Forest Service must develop and analyze an **Ecological and Economic Sustainability Alternative.** This alternative should prioritize subsistence, tourism, and fisheries by classifying remaining old-growth forests and high-value watersheds as **unsuitable for timber production.**

1. Mandatory Requirement for Ecological Integrity (36 CFR 219.8 & 219.9) The 2012 Planning Rule requires that the plan include components to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems.

- Structure and Connectivity: Current management trajectories for old-growth logging disrupt the structure and connectivity of the Tongass ecosystem. To meet the integrity standard, the Forest Service must analyze an alternative that identifies all remaining old-growth as unsuitable for timber production.
- Riparian Protections: Per 36 CFR 219.8(a)(3), the plan must maintain the integrity of riparian areas. The Forest Service must establish standards that ensure no management practices cause "detrimental changes in water temperature" or "sediment deposits" that affect fish habitat (16 U.S.C. § 1604(g)(3)(E)).

2. Integration of Indigenous Knowledge (36 CFR 219.4) The Planning Rule mandates that the Forest Service request and encourage the use of Indigenous Knowledge in the planning process.

- Scientific Integration: The revised plan must demonstrate how Indigenous Knowledge has been substantively integrated into the best available scientific information used to determine habitat suitability.

- Co-Stewardship: The plan should include specific plan components for co-management and co-stewardship of traditional territories. An alternative that continues to prioritize industrial timber against the stated conservation goals of Southeast Alaska Tribes fails to meet the requirements for social and cultural sustainability.

3. NFMA Suitability Requirements (16 U.S.C. § 1604) NFMA requires the Forest Service to identify lands that are not suited for timber production based on physical, economic, and other relevant factors.

- **Economic Insuitability:** The Tongass timber program consistently operates at a massive net loss to taxpayers. Under the 2012 Planning Rule, suitability must reflect "integrated" resource management. When the costs of administration and road-building far exceed timber receipts—and simultaneously degrade the high-value standing resources of subsistence and tourism—those lands fail the test of economic suitability.
- **Physical Insuitability:** Harvesting in the perhumid, steep-slope watersheds of Southeast Alaska poses an irreversible risk to soil stability and watershed health. The revised plan must use site-specific monitoring to re-classify watersheds critical to salmon production as unsuitable to prevent the "impairment of the productivity of the land" (16 U.S.C. § 528).

4. ANILCA Section 810 (Subsistence Protections) The Forest Service has a statutory mandate under ANILCA Title VIII to protect subsistence uses.

- **Deer & Old-Growth:** Sitka black-tailed deer rely on old-growth canopy for winter survival. Continued old-growth logging constitutes a "significant restriction" on subsistence uses by reducing the carrying capacity of the land for primary food sources.
- **Watershed Integrity:** Because the customary and traditional harvest of salmon is the cornerstone of rural Southeast Alaska, any timber activity that risks sedimentation or thermal changes in fish-bearing streams directly violates the spirit and letter of ANILCA Section 810.

5. MUSYA and the Highest and Best Use While MUSYA (16 U.S.C. § 528-531) mandates multiple use, it explicitly states that management is **not** required to pursue the greatest dollar return or greatest unit output. The "combination that will best meet the needs of the American people" in 2026 is one that prioritizes the $2 billion-a-year tourism and commercial fishing industries over subsidized timber. A revised plan that does not prioritize these high-value renewable resources fails to meet the sustained yield mandate of MUSYA.

Conclusion

FSEEE requests that the Draft Environmental Impact Statement (DEIS) include robust analysis of an **Ecological and Economic Sustainability Alternative** that:

1. Classifies all remaining old-growth and high-value watersheds as **unsuitable** for timber.
2. Prioritizes **restoration-based economies** and **co-stewardship** with Tribal governments.

3. Evaluates the "Opportunity Cost" of timber sales to subsistence opportunities, regional tourism and fishing sectors.

Thank you for the opportunity to comment and for ensuring that the Tongass is managed for its most valuable and enduring resources.

Sincerely,



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