Southeast Alaska Fishermen's Alliance

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USDA Forest Service
Tongass National Forest
Monique Nelson, Forest Supervisor
648 Mission Street, Suite 110 Federal Building,
Ketchikan, AK 99901

RE: Tongass National Forest Land Management Plan Revision (TNFLRP)

Submitted electronically at:
https://cara.fs2c.usda.gov/Public/CommentInput?Project=64039

Dear Ms. Nelson,

Southeast Alaska Fishermen's Alliance (SEAFA) is a non-profit commercial fishing association representing our 300+ members involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. Our membership is over 80% Alaskan residency, and the majority of the members participate in recreational, personal use and subsistence fisheries in addition to their commercial fishing.

The Tongass National Forest is critical to the fishery resources of Southeast Alaska, particularly salmon. The preliminary draft plan does not adequately elevate the **protection** of fishery resources and habitat for consideration, instead it appears to be more managing the people's access to the resource. The Tongass National Forest Service should not be managing or allocating the fishery and wildlife resources, that is the job of the State of Alaska, Board of Fish and Fishery Subsistence Board.

Specific to the preliminary draft plan are the following comments:

- Page 12 – Need to Change, 2nd bullet point needs to include commercial fishing. Commercial fishing is the backbone of many of these rural communities and allows for many to participate in a subsistence way of life.
- Page 40 – Infrastructure, Facilities and Access (IFA) – Under the need to change, "to include direction to address the need for transportation and

communication projects in SE Alaskan communities" is the recognition and responsibility for minimizing, maintaining and repairing where necessary fish habitat barriers such as failed culverts. Current infrastructure or retired infrastructure needs to be fixed or maintained before new infrastructure projects are developed. As new projects are developed, a maintenance program needs to be part of the program so habitat or fish & wildlife resources are not impacted.

- Page 45 – Lands and Land Uses (Land) – the description of the section mentions the special uses programs to authorize the occupancy and use of National Forest system lands – the plan's need to change section, does not incorporate directions for clarifying and process for issuing special use permits including for the storage of crab pots in designated areas.
- Page 47 – Old Growth Forests – SEAFA agrees with the importance of old growth forests to fish habitat and the need for continued protection of the old growth forests and fish habitat. This section speaks to the Economic importance to nature-based tourism and recreation but does not include the importance to commercial fishing.
- Page 53-56 – Recreation and Tourism – an important aspect of tourism and recreation in the Tongass National Forest is tied to salmon. This again brings to light the importance of fish habitat being protected and maintained, which is not considered in this section.
- Page 60-63 – Socia-Economic Management (ECON) – the 2nd paragraph finally acknowledges the importance of commercial fishing to the SE AK economy and coastal rural communities. What is not considered in the Need to Change section is to make sure that consideration of one type of resource management such as timber or mining does not harm the salmon resource & habitat importance to subsistence, commercial, and recreational fisheries.
- Page 70 – FW-SBST-DC 4 mentions "In-season subsistence harvester restrictions are informed by fish and wildlife monitoring to address conservation, access and competition concerns". This sentence sounds like an overreach of your authority by managing the user and allocating between users. Your authority lies in protecting the habitat and land not the regulations for harvesting.
- Page 90 – Suitable Wild and Scenic Rivers (SWSR) We object to this section of the plan. ANILCA (sections 101(d), 708(4), and 1326(b)) restricts further wilderness designations of Conservation Units in Alaska. Therefore, the Forest Service should not be spending time or working on classifying streams for designation by Congress as Wild and Scenic Rivers. Nor should the Forest Service be managing the systems identified as if they have been

Congressionally designated. While many of these rivers deserve recognition and special protection, instead provide a new classification, explain why and what those protections should be as they are **not** Wild and Scenic rivers.

- Page 94 – Key Fisheries Watersheds (MA-FISH) – This section should re-emphasize the importance of the Tongass Timber Reform Act (TTRA) and the requirement for stream-side buffers, by explaining what the protections are within the TTRA legislation and not just referencing the legislation. Especially, as the Forest Service is stating that timber production is suitable in key fishery watersheds. At first glance of the document, it appears as if many Key Fishery watersheds are not considered for increased protection. This is because of other designations such as being a monument or being in an old growth area. Sometimes repeating information does simplify and make the document better for a lay person to find the information they are looking for. For my members to be able to go to a single section and see what protections all the many fishery systems in SE have would be helpful.
- Page 101 – Log Transfer systems for the marine environment should not be permitted in an area of important protected anchorages or where commercial fisheries or recreational fisheries occur such as for Dungeness crab.

The Tongass National Forest is incredibly important as a salmon forest and most SE Alaska residents rely on salmon for food, way of life or recreation and therefore salmon habitat needs to be protected. Southeast Alaska's commercial fisheries and the tourism industry are primary private sector economic drivers in the region.

Thank you for this opportunity to comment on the preliminary draft plan concept for the Tongass National Forest Land Management Plan revision.

Sincerely,



Kathy Hansen
Executive Director