

Understood this is a work in progress and I appreciate the opportunity to participate in the Tongass Forest Plan revision process; however, providing substantive and meaningful comment is currently challenging. I fully support the concept of Potential Management Areas (PMAs) but their current ambiguity, particularly regarding Community Use areas, makes it difficult to evaluate their impact and provide meaningful input. Phrases like, “benefit from additional direction to facilitate increasing shared stewardship with local communities,” is far too vague and wide open to interpretation to allow informed comments from the public. Furthermore, the Other Status Areas (Designated Forest and General Forest) currently lack definitions for allowable uses and management prescriptions and accepted levels of change to the landscape, yet make up a large component of the Tongass.

We have been informed that these areas will be tied to a revised Recreation Opportunity Spectrum (ROS); however, because the ROS is still in development by the USFS and unavailable for public review, the public cannot see the full picture and what’s being proposed to provide meaningful comment. When critical components are not fully developed, or missing, the desire to receive public comment feels premature and does not allow informed input from the public.

Request: I formally request that the USFS provide an additional public comment period once the PMAs, ROS, and Other Status Area definitions are fully integrated and defined. This will ensure the public can provide informed feedback on the actual impacts of the plan rather than responding to an incomplete draft plan and their supporting documents.

My primary concern regarding the Proposed Management Area mapping is the disproportionate application of High Commercial Recreation Use (HCREC) designations in remote areas and around small, rural communities. HCREC is defined as areas served by large and frequent cruise ships (e.g., Juneau, Sitka, Ketchikan). However, these areas are being mapped adjacent to small communities like Whale Pass and remote areas on the Forest. Assigning a high commercial recreation use designation in these locations is out of scale and does not align with the infrastructure or desired character of smaller communities and remote areas.

As presented, the draft plan creates a wide gap in recreation use between HCREC and Low Commercial Recreation (which focuses on non-commercial recreation activities). This leaves no middle ground for local, smaller scale commercial recreation operators who provide vital services but do not operate at the high capacity and require significant infrastructure as areas surrounding large cruise ship ports.

To respond to this void, I would recommend the plan revision includes a "Moderate Commercial Recreation Use" category (or similar). This new category allows for sustainable smaller scale commercial recreation that supports local economies but is not within the same management area that also prescribes uses and impacts as the industrial tourism found at the MGRA. This new management area provides a more accurate management tool for areas near

small communities that desire some commercial activity but wish to maintain a more primitive or semi-primitive character.

The success of this revision depends on the public's ability to understand how these designations will function on the ground. Without the ROS and clear definitions for allowable use for several Potential Management Area and Other Status areas, the current draft remains too speculative for definitive comments from the public. I look forward to reviewing the draft revised plan when further developed and supported by the completed ROS. I hope for an extended engagement process that reflects the complexities of these management decisions and not a rushed process where valued information is incomplete or missing.

Again, it is understood the draft revision is a work in progress and I like the direction it is moving towards and the use of Potential Management Areas. I appreciate the work that has gone into this document by the USFS and the opportunities for the public to help guide the development of this important management tool. I look forward to future reviews and assisting in the development of this document.

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