

**Comments of Rebecca Knight
for the proposed
Tongass National Forest Revision
May 6, 2026**

Submitted through:
the Tongass Plan Revision Site and email to Erin Mathews

Plan Revision Coordinator
U.S. Forest Service
Tongass National Forest
erin.mathews@usda.gov

Hello Ms. Matthews:

Following are my comments for the proposed Tongass National Forest Plan Revision process. I will keep it short, as comments from diverse ENGOs (environmental non-governmental organization) which represent my viewpoint, will cover my concerns in more depth.

My family has commercially, sport, and personal use fished the waters of SE Alaska for over five decades. We continue to do so as I write. Salmon is our bread and butter, and thus we are very concerned about the maintenance of quality, intact salmon habitat. We also harvest Sitka Black-tailed deer annually, and venison comprises about 98% of the red meat in our annual diet. We support intact, forested Old Growth habitat that deer, as well as other old growth dependent species thrive on. Please, no more fragmentation of Old Growth habitat through extraction of cedar, spruce, and hemlock to feed Viking Lumber and Alcan/Transpac's in-the-round, exports. Enough is enough!

The plan Revision is on a fast track that will only result in gaping, understaffed agency errors which will be litigated—likely under a different or severely weakened post-Fall election Administration. Please save the American taxpayer and do it right the first go 'round.

I am deeply troubled by various, willfully ignorant directives that will directly influence the proposed Tongass Plan revision.

In particular:

Executive Order 14153, would rescind the 2001 Roadless Area Conservation Rule, prohibiting road construction, road reconstruction, and logging in inventoried roadless areas, with only a few exceptions. It is certainly revealing

the extent of industry and political sway the Administration has been influenced, as clearly evidenced with the explicit exclusion of the Tongass National Forest from the 2001 Roadless Rule. After years of back-and-forth, the 2001 Rule was finally settled law and in-fact enjoys monumental support. The Trump Administration proposed Roadless recession was overwhelmingly unpopular as evidenced by public comments.¹

While some agency/Administration officials may applaud a rollback of the 2001 Rule, such recession will not be without dire consequences to species viability.

Therefore, please include the impacts of the proposed Roadless Rule rescission on all flora and fauna Species of Conversation Concern (SCC) including but not limited to the Alexander Archipelago Wolf, which was glaringly absent (and is a bona-fide “information gap”²) from your Tongass National Forest Plan Revision SCC Identification Process #64039. The public record is clear that the AA wolf most certainly qualifies for inclusion due to threats from intensive logging, road construction, hunting and trapping, and genetic inbreeding—and this condition is especially so on Prince of Wales Island.

Executive Order 14153, “Unleashing Alaska’s Extraordinary Resource Potential,” ordered the Secretary of Agriculture to “place a temporary moratorium on all activities and privileges” pertaining to roadless protections on the Tongass National Forest and instructs the Secretary to reinstate the earlier Trump-era rule exempting the Tongass from the Roadless Rule.

Executive Order 14225, “Immediate Expansion of American Timber Production” instructs the US Forest Service and other federal entities “to facilitate increased timber production.”

Such above orders are exactly why all Tongass species and habitats are at imminent risk, and are, in fact, a siren call, that the Forest Service’s only concern, under the direction of the Trump Administration, is for resource extraction.

¹ Joint statement by Earthjustice, The Wilderness Society, National Resource Defense Council, Alaska Wilderness League. <https://earthjustice.org/press/2025/proposal-to-scrap-roadless-rule-draws-public-outcry> “In only 21 days, the USDA received [625,737 comments](#) at the close of a public comment period on the proposed recession, an independent tally collected by coordinating organizations showed that at least 500,000 of the public comments and petition sign-ons were sent by Americans opposed to the Roadless Rule rollback.”

² Forest Service terminology per the agency’s March 16, 2026 email to stakeholders, “New content materials & virtual town hall coming for Tongass Plan Revision”

These edicts from the current Administration, spell the demise of all other uses of the Tongass including sport, subsistence, personal use, and commercial fishing, recreation, and much more, and will result in the crown jewel of our national Forest system—the Tongass—to be turned into a wasteland. If realized, the creation of this wasteland will be funded by the American taxpayer. Shame.

Please implement the following for inclusion in the Plan:

-The Forest Service needs to develop a broad purpose and need statement that allows for downscaled timber-take alternatives, including alternatives that refrain from extracting old-growth, alternatives that eliminate clearcutting and alternatives that do not require any road construction, temporary or otherwise. It is reasonable to consider alternatives that meet other objectives and attain or prevent the loss of non-timber desired conditions even if they exclude a large exportable old-growth timber supply;³

-Cease and desist on all timber sale planning and implementation and develop a genuine Restoration Plan. Only permit valid and verifiable restoration of all acres that have been degraded through habitat loss (i.e. no projects allowed under the guise of restoration which are no more than a public relations ruse used to access yet more timber);

-End the so-called, “Good Neighbor Authority.” It is a ruse with a contrived public relations name. GNA shifts sale preparation, administration and oversight of Tongass National Forest timber sales to the State of Alaska and as admitted by those supporters, GNA gets the industry “halfway” toward their goal of privatization of Tongass; the Forest Service shouldn’t make more Good Neighbor Authority agreements and especially with taxpayer’s money. The Trump administration should fulfill its promise of draining the swamp and audit the Tongass National Forest timber sale program prior to wasting another taxpayer dime here;

-All revision alternatives must provide for no further diminishment of scenic integrity objectives that will result in both larger and more visible clearcuts and impacts to visual resources from development activities. There must not be any reduction of scenic integrity objectives which would degrade scenery for boaters using marine waterways, for drivers using the Tongass roads for recreational purposes, or hikers using trails. Such deterioration from existing conditions that provide scenic values would be transformed to a landscape that appears heavily altered. Please do not include in any alternative allowance for such degradation.

³ City of New York v. U.S. Dep’t of Transp., 715 F.2d 732, 742-742 (2nd Cir. 1981).

-Please increase no-cut buffers around classified high-vulnerability karst features, such as sink holes and cave openings. Prohibit any logging on karst derived soils.

-No degradation of habitat for Old Growth dependent species, or in-fact any species. Species with large scale acreage requirements to maintain species viability must remain intact and not fragmented by one acre by resource extraction;

-Please provide actual, up-to-date data on the small number of workers in federal timber and re-evaluate whether old-growth timber sales contribute to the economic sustainability of the region or provide jobs and opportunities for southeast Alaska residents. Since the Forest Plan revision, is intended to keep Viking Lumber and Alcan/Transpac in business, please provide verifiable data showing that those companies actually provide timber for processing by Alaska workers. Your NEPA analysis needs to confront significant economic issues and changing workforce needs in order to assess whether the Revision – aimed primarily at providing a timber supply for Alcan/Transpac, its General Partner in Vancouver, B.C., and mills in China – would meet the local employment and economic viability needs of Southeast Alaskans and the American people.

-Please provide an alternative that includes a prohibition on all any further mining projects;

-Increase the width of no-cut buffers on all Class I, II, III, and IV fish bearing streams/watersheds and prohibit “exceptions” which are in-fact aimed at logging stream-side pickles;

-Provide that all alternatives prohibit application of Roundup herbicide Tongass-wide. It’s active ingredient, glyphosate is a confirmed killer;

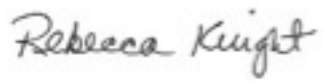
-Provide alternatives which prohibit additional road construction and identify roads that can be put to bed for all alternatives;

-Repair all culverts blocking/impeding fish passage;

-Develop quantifiable and verifiable criteria for restoration activities that disallow resource extraction as requirement of the restoration;

-Allow areas in later second growth stages to recover and revert back to Old Growth conditions. This is especially so, for areas with former high site index and important for species viability. Provide maps which divulge the former site index of all Tongass-wide acres logged since 1960 and provide an Alternative that allows for those acres to recover back to a uncut condition to allow for true stand “restoration.”

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Knight". The ink is dark and the handwriting is fluid.

Rebecca Knight
Petersburg, Alaska