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May 6, 2026

Ms. Erin Mathews, Environmental Coordinator
Tongass National Forest
USDA Forest Service
648 Mission Street, Suite 110
Federal Building
Ketchikan, AK. 99901

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

RE: Comments on Tongass Forest Plan Revision -- Preliminary Draft Plan Content

Dear Ms. Mathews:

On behalf of The Nature Conservancy in Alaska, thank you for the opportunity to provide comments on the U.S. Forest Service's (USFS) Preliminary Draft Plan Content for the Tongass Forest Plan revision.

The Nature Conservancy (TNC) is a global conservation organization working around the world to conserve the lands and waters on which all life depends. TNC has been working side by side with communities in Southeast Alaska for over two decades to help ensure the sustainability of the diverse benefits that people derive from the lands and waters of the Tongass. Over this time, we have contributed through habitat improvement projects, sustainable economic and workforce development initiatives, original science, collaborative planning processes, and support of community-led conservation efforts. We are committed to developing durable and sustainable solutions for a healthy Tongass and it is in that spirit that we offer these comments.

I. Tongass Plan Revision Process

TNC Alaska has been active in this planning process from the beginning, providing formal comments at every opportunity, as well as providing direct input on content to planning staff and helping to support avenues for public engagement in the recent community meetings and beyond. While we appreciate the additional opportunity for community input through this current comment period, we remain concerned with the timeline. As we stated in our NOI comments, submitted March 20, 2026:

“We strongly urge the USFS to allow communities, collaborating agencies, stakeholders, and participating groups time to meaningfully contribute to the forest planning process. Because this is a process we go through once in a generation, we want to ensure the best quality work goes into it. The expedited timeline and the confusion of consecutive comment periods do not sufficiently allow cooperating agencies, Tribes, communities, and partners the spaciousness to provide targeted and informed comments or for that information to be integrated by the agency before moving to the next planning phase”.

Although the Proposed Forest Plan and the Draft Environmental Impact Statement (DEIS) will not be out until November, it is our understanding that the USFS has just over a month to incorporate all the feedback they have received in the last two comment periods before it moves into the NEPA contractor’s hands. With agency staff reductions and multiple Tongass leadership transitions, this is an inadequate and unreasonable timeline to meaningfully address and integrate the information that communities, Tribes, partner agencies, and stakeholders have generously provided. We urge USFS leadership to allow staff more time to develop and refine the proposed plan content, management areas, and alternatives before beginning the DEIS development.

II. Integrating a Community Alternative

As the USFS has progressed through the phases of planning, we have engaged with an initiative to develop a community-based alternative. The goal in developing a community alternative has been to define a durable approach that sustains watershed productivity, ecological integrity, cultural continuity, and local livelihoods. The core strength of the alternative is a conservation strategy designed to support healthy subsistence habitat at the watershed scale. The conservation strategy retains the core architecture and intent of the existing Tongass conservation strategy while clarifying and updating the operative pieces most relevant to current plan needs, climate resilience, and monitoring.

Proactively engaging on this alternative has helped us and others in the region meaningfully consider how plan components, including desired future conditions, objectives, standards, and guidelines, can be designed to reach desired management outcomes. While it is impossible to craft an alternative that represents complete consensus of every community and group within the Tongass, the plan components developed through this process are the product of countless conversations with people across the region and several stages of refinement. We urge the USFS planning team to review and integrate the alternative into the DEIS so that the broader public can provide more direct feedback in the next planning phase. We have outlined some of the strengths of the community alternative in this section, but please refer to the full submission to the CARA portal by Bob Christensen (submitted May 6, 2026).

i. Key strengths of the community alternative

A watershed-based approach that is designed to maintain or restore the habitat capacity, hydrologic function, old-growth structure, fish passage, deer winter range, and local access that make subsistence possible. The watershed is the basic accountability unit: each watershed is assessed against measurable targets, then assigned to restoration, maintenance, or limited-use pathways based on condition and trend.

Robust forest-wide standards and guidelines that establish ecological, cultural, and stewardship sideboards that apply across all management areas, including:

- Maintained watershed productivity for subsistence values
- Protected stream buffers, old growth retention, deer winter range, and aquatic connectivity with measurable indicators reported on regularly scheduled intervals
- Young growth forests as the primary timber backbone with working forest lands managed on a 100-year rotation framework with limited entries and specific management area retention targets
- Seeks to meet Tribal needs for cultural wood supply in perpetuity and prioritize access to totem- and canoe- quality red cedar for Tribal governments

Management areas that organize around levels of accessibility:

- Community Accessible areas that are managed for subsistence first, given they are closest and most accessible to communities and support the highest levels of community use. The management of these areas is strengthened by defined pathways for co-management and co-stewardship.
- Remote with Roads are Areas with open roads but generally not easily accessible from communities; managed for young-growth forestry, restoration-byproduct wood, and limited and consistently declining bridge-timber old-growth harvest only where watershed safeguards are met
- Remote without Roads are areas that generally lack roads and are managed for remote character. These areas are managed with strong conservation safeguards, carefully screened tourism infrastructure, hydrologically restored legacy-road corridors, and young -growth timber harvest only where it can occur without building new roads, temporary roads, or reopening/re-establishing legacy roads.

ii. Additional considerations

As previously mentioned, this alternative was developed through extensive input and conversations with people across communities, sectors, and interests. However, we recognize that it does not represent all perspectives in the region. Partner organizations may have more specific proposed standards and guidelines that could align with or be incorporated into this broader framework. These include, in particular, cultural tree

management, subsistence, and co-management approaches developed by local and regional Tribes; more detailed direction for commercial recreation management; expanded definitions of priority watersheds beyond the T77; and specific actions aligned with the Tribal Homelands APA petition.

Additionally, the management area boundaries in the Community Alternative were drawn under defined assumptions around roads and accessibility, but these may be strengthened by local community input. Also to be improved by both local and agency input is the design of a co-management structure for the Community Accessible management areas. We strongly support a mechanism for community-driven management priorities on lands surrounding communities but recognize there are feasibility considerations associated with the various forms this may take. We encourage the USFS to use the Community Alternative's proposed Community Advisory Committee structure to begin creatively exploring what this could look like at varying levels of community capacity across the region.

III. Preliminary Draft Proposed Plan Feedback

Due to the high-level nature of the information contained in the Preliminary Draft Plan Content (March 2026), our focus has primarily been on the community alternative discussed above. However, we have included some high-level feedback on the proposed plan direction in case the community alternative is not extensively integrated:

General Forest

- This area as currently mapped does not provide enough specificity as to where development and timber harvest is planned to occur. Communities require that specificity in order to provide meaningful input on the designated lands within this category. If this broad category is retained into the next planning phase, timber suitability should be clearly mapped, with distinctions for young and old growth

Community Use Management Areas (MA-CMTY)

- We appreciate the intention behind increased shared stewardship in the MA-CMTY and the goal for more community-driven management direction
- We understand the desire to pull from previous efforts (Roadless 2020) in this expedited planning process, but only mapping these areas around a handful of communities provides inconsistent management and inequitable opportunities for communities to drive management on the land surrounding their communities. Thus, the USFS should expand these areas with input and direction from communities not currently included
- Standards and guidelines should be developed that ensure clear pathways for communities to collaborate on management direction and shared stewardship

Key Fisheries Watersheds (MA-FISH)

- Key Fisheries Watersheds are a valuable designation that are responsive to the priorities of salmon and subsistence that have been elevated throughout the planning process
- The preliminary maps indicate these areas were drawn to include T77 watersheds. While T77 is a simple existing designation to draw from, there may be additional watersheds to consider for inclusion given updated and best available science.
- The inclusion of old growth timber harvest for aquatic restoration purposes should be more clearly defined in this section. While we understand it to mean select harvest for root-wad trees for installation in streams as large woody debris, the mention of old growth harvest in this management area requires careful definition using standards and guides that dictate and limit allowable uses such as large woody debris installations.
- If young growth timber harvest is allowed in MA-FISH, standards and guidelines should clearly define harvest sideboards that include minimum 300-foot buffers, basal area retention thresholds, consideration of harvest timing and salmon life cycle and habitat use, maintain elevational and hydrological connectivity, and no additional road development.

IV. Conclusion

Thank you again for the opportunity to submit comments at this substantive moment in the revision process for the Tongass National Forest Plan. As an organization with over two decades of experience conducting science, engaging in management, and partnering with the U.S. Forest Service in the Tongass National Forest, we are deeply invested in ensuring the health of the lands, waters, and communities that fundamentally depend on the Forest. Please consider us a resource and a partner in this process.

Sincerely,



Caitlin Hedberg
Alaska State Director
The Nature Conservancy



Julia Nave
Southeast Alaska Program Director
The Nature Conservancy