



May 6, 2026

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

Re: Trout Unlimited Comments on Tongass Preliminary Draft Plan Content (Project #64039)

Dear Ms. Mathews:

Trout Unlimited (TU) appreciates the opportunity to comment on the Preliminary Draft Plan Content for the Tongass Forest Plan Revision. These comments supplement the detailed scoping comments TU submitted on March 20, 2026.

The Preliminary Draft Plan Components were published the next business day after the scoping period closed. The 2012 Planning Rule (36 CFR § 219.4) requires iterative, collaborative public participation throughout the planning process, including the use of public input in developing plan components. Developing Preliminary Draft Plan Components without consideration of scoping comments appears inconsistent with these requirements and raises concerns that public participation is not being meaningfully integrated into plan development. The compressed timeline further undermines public confidence in the integrity of the plan revision process.

Prior to proceeding with the Draft Environmental Impact Statement, Trout Unlimited requests that the Forest Service revise the Preliminary Draft Plan Components after fully considering scoping comments and public comments on the draft components, and provide a transparent summary of how those comments informed subsequent revisions.

Trout Unlimited is the nation's largest sporting organization dedicated to coldwater conservation, with more than 300,000 supporters nationwide and more than 20,000 supporters in Alaska—including anglers, lodge and outfitting business owners, guides, subsistence harvesters, and commercial fishermen. In addition to our 15 Alaska-based staff and our members in more remote parts of the state, TU has active chapters in Juneau, on the Kenai Peninsula, in Anchorage and the Mat-Su Valley, and in Fairbanks.

Many of our members rely on the fish, wildlife, and water resources of the Tongass for fishing, hunting, subsistence, outdoor recreation, and employment in the fishing and tourism industries. TU is committed, through the investment of significant staff and financial resources, to conserving and restoring the fisheries and watersheds of the Tongass, and to ensuring the region's wild salmon resources continue to serve as the economic and cultural foundation of Southeast Alaska.

Trout Unlimited maintains a long-standing partnership with the U.S. Forest Service, carrying out restoration and active forest management through grants and cooperative agreements that invest significant federal, state and private funding toward improving fisheries productivity and watershed health on national forest lands, including on the Tongass. We leverage the Forest Service's limited resources by bringing in additional funding, technical expertise, and new partners to the table, amplifying the impact of shared conservation goals.

Our work helps create local jobs and economic opportunities in Southeast Alaska, particularly through on-the-ground fish habitat restoration projects. On the Tongass, these efforts largely focus on addressing the legacy impacts of decades of unsustainable logging and road building, including reconnecting fragmented stream habitats that are essential to strong and productive fisheries and resilient community infrastructure.

In addition to various watershed restoration and aquatic organism passage projects throughout the Tongass, TU participates in a variety of collaborative groups throughout Southeast Alaska, including the Southeast Alaska Fish Habitat Partnership, the Tongass Transition Collaborative, and the Sustainable Southeast Partnership, among others.

The Tongass Forest Plan revision is of great importance to TU and its members, as it will set the management direction for the Tongass and help guide natural resource management activities for the next decade or more. We appreciate this opportunity to reiterate our priorities for the revised Forest Plan, offer specific feedback on the Preliminary Draft Plan Content, and inform the draft range of alternatives that will be analyzed in the forthcoming Environmental Impact Statement. TU intends to remain an active participant throughout the plan revision process.

A. Priorities for the Revised Forest Plan

Trout Unlimited's comments on the Preliminary Draft Plan Content are guided by six core priorities, which are detailed in our scoping comments and summarized here.

1. **Forest management should prioritize watershed health, fish, wildlife, subsistence, and recreation to align with the values and needs of the people who live, fish, hunt, work, and recreate on the Tongass.** The overriding message from 25 community workshops during the assessment phase was clear: "Forest health is foundational to our way of life." Management areas, objectives, standards, and guidelines should maintain and improve forest health in ways that support healthy and productive watersheds; robust fish and wildlife populations; sustainable sport, commercial, and subsistence harvesting; rich and vibrant communities; and the industries that drive a diverse and stable regional economy—fisheries, recreation, and tourism. Maintaining and improving important fish and wildlife habitat is in the best interest of the public.
2. **Forest management decisions are grounded in the best available scientific information.** The 2012 Planning Rule requires that the best available scientific information be used to inform the planning process and plan decisions. On the Tongass, that body of research includes decades of peer-reviewed studies on salmon ecology, watershed function, old-growth forest dynamics, wildlife habitat requirements, and the cumulative effects of logging and road building. Science should serve as the foundation for management area designations, habitat safeguards, restoration priorities, standards and guidelines, and timber suitability determinations in the planning process. Where the agency's own

scientific findings point toward stronger protections, the revised Forest Plan should reflect that science.

3. **The best remaining fish and wildlife habitat on the Tongass must be maintained.** The Tongass produces more wild salmon than all other national forests combined. In peak years, the seafood and visitor industries often generate more than \$1 billion each in economic outputs (Alexander & Gorte, 2014). The revised Forest Plan should maintain existing habitat safeguards for Tongass 77 watersheds, TNC/Audubon Priority Conservation Areas, and inventoried roadless areas, which are essential to recreational, commercial, and subsistence users. The Forest Plan should also accurately reflect the enormous economic and cultural value of conserving these places.
4. **Restoration is prioritized for areas of degraded, high-value fish and wildlife habitat.** Across the Tongass National Forest, more than 1,100 bridges and culverts—approximately 30% of all stream crossings—do not meet state or federal standards (U.S. Forest Service, 2019). And in large tracts of previously logged areas, the forest canopy is reaching the stem exclusion stage and becoming poor habitat for deer and other wildlife (Hasbrouck, 2023). The loss of high-quality habitat presents significant threats to fishing, hunting, and outdoor recreation on the Tongass, and reduces important subsistence opportunities for local communities. The final Plan Revision should identify restoration-focused management areas and objectives that would deliver the strongest return on investment for fish, wildlife, and local communities.
5. **The Tongass is managed to support the thriving outdoor recreation and visitor industries while minimizing conflicts between user groups.** Southeast Alaska is the most visited region of the state, welcoming more than 2.2 million travelers in 2024 (Southeast Conference, 2025). The visitor industry is the largest provider of jobs in the region, comprising 19% of regional employment. Tourism supported more than 8,500 jobs and more than \$367 million in wages in 2024 (Southeast Conference, 2025). The revised Forest Plan should provide direction for minimizing the impacts of large-scale tourism on forest resources while addressing the priorities and concerns of local communities and remote recreation interests.
6. **Where suitable and when implemented according to robust standards and guides, timber management should focus on the selective harvest of young-growth forest at an appropriate scale for local milling and processing and for other value-added forest products.** Previous approaches to timber management that focused on old-growth logging or clearcutting of young-growth for export markets are unsustainable and sent much of Southeast Alaska’s forest-based wealth overseas at great expense to American taxpayers and Southeast Alaskans. Over a 20-year period from 1999 to 2018, the Forest Service lost approximately \$600 million on the Tongass timber program—an average of \$30 million per year—with timber sale receipts covering just 5.4 percent of program costs (Taxpayers for Common Sense, 2019). The revised plan should not perpetuate a model that generates massive taxpayer losses while degrading the fish and wildlife habitat that powers Southeast Alaska’s billion-dollar fishing, recreation and tourism economy.

Following significant changes in global timber markets and shifts in community values, the Forest Service first initiated a process to transition the timber program on the Tongass to young-growth management in 2010. Looking ahead to the next 15+ years, we support integrated forest management

projects that facilitate a combination of habitat restoration, precommercial and commercial thinning to improve forest health and habitat quality, and right-sized young-growth offerings. These projects should prioritize local employment while supplying local and regional markets for young-growth forest products and aiding economic diversification.

As stated in our scoping comments, the draft Need to Change references “timber, minerals, tourism, recreation, and other important economic drivers” but does not name salmon or fisheries, which is a significant oversight that ignores perhaps the forest’s most important resource. This omission fundamentally distorts the economic picture. The revised plan must explicitly recognize salmon and fisheries as Southeast Alaska’s primary economic drivers. It is critical that the Tongass is managed with an emphasis on conserving and restoring the natural resources that power the regional economy and generate the most value to local communities.

B. Overarching Comments on the Draft Plan Content

Trout Unlimited has identified five central concerns with the Preliminary Draft Plan Content.

- 1. The timing and sequencing of this comment period undermine meaningful public participation.**
The Preliminary Draft Plan Content was released on March 23, 2026—the next business day after the scoping comment period closed on March 20, 2026. Given this compressed timeline, scoping comments submitted by Trout Unlimited (TU), other organizations, Alaska Native Tribes, Southeast Alaska communities, and individual members of the public were not substantively considered in the development of the Preliminary Draft Plan Content. As a result, the document the public is now being asked to evaluate appears to have been developed without the benefit of public input on the Forest Plan’s foundational questions.

This sequencing raises serious concerns about the integrity of public participation in this process. The 2012 Planning Rule (36 CFR §§ 219.4, 219.7) requires iterative, collaborative public participation and the use of public input in developing plan components, while NEPA is intended to ensure informed decision-making supported by meaningful public engagement. When scoping comments do not inform the development of draft plan content, the scoping process risks being reduced to a procedural formality rather than a genuine opportunity to shape the plan. TU raised substantive issues in its scoping comments, including the omission of salmon from the plan’s economic framing, the need for a fisheries-focused management alternative, apparent inconsistencies between “no need to change” findings and the agency’s own assessments, and the importance of maintaining existing habitat safeguards.

Trout Unlimited urges the Forest Service to take the following steps to restore public confidence in this process and ensure consistency with the Planning Rule’s public participation requirements. First, the agency should clearly demonstrate how scoping comments have been considered and incorporated into the development of draft plan content by providing a transparent summary of how those comments informed revisions. Second, the Forest Service should provide an additional public comment opportunity on draft standards, guidelines, and objectives after scoping input has been integrated and prior to analysis of the draft range of alternatives. The current comment period asks the public to evaluate a plan framework that does not yet include its most consequential components. Third, future comment periods should be sequenced to ensure that public input from one stage is

meaningfully incorporated before the next stage begins. Finally, the Forest Service should structure public engagement timelines in a manner that reflects the seasonal realities of Southeast Alaska communities—May through November is a critical period for fishing, hunting, and economic activity.

2. **The draft plan content lacks standards, guidelines, and objectives.** TU recognizes that additional plan components will be presented in the Draft Forest Plan and Draft Environmental Impact Statement (EIS). However, the absence of core plan components at this stage limits the public’s ability to meaningfully evaluate the proposed plan framework, as the agency establishes the substantive direction that will govern implementation. The 2012 Planning Rule (36 CFR § 219.7) requires that plan components—including standards and guidelines—be developed through an iterative process informed by public participation. Requesting comment on a framework without these elements constrains the public’s ability to provide informed input and is inconsistent with the intent of meaningful, iterative engagement under the Planning Rule and the National Environmental Policy Act.

Trout Unlimited urges the Forest Service to revise the Preliminary Draft Plan Content after fully considering scoping comments and public comments on the draft content, and to include draft standards, guidelines, and objectives in that revision. The agency should then provide an additional opportunity for public review and comment on these more complete draft plan content prior to advancing to the Draft Environmental Impact Statement and analysis of the range of alternatives, ensuring that public input meaningfully informs plan development before key decisions are made.

3. **The repeated “No Need to Change” findings contradict the agency’s own assessments.** The Preliminary Draft Plan Content states “No need to change identified for this resource in the Assessment” for nearly every aquatic and riparian ecosystem type, including rivers and streams, riparian forests, lakes and ponds, forested wetlands, tidal wetlands, and subalpine forests. Yet the agency’s own draft Aquatic Ecosystems Assessment acknowledged that the prior plan “did not evaluate the ecosystem integrity of the Tongass National Forest ecosystem as a whole” and identified significant opportunities to strengthen aquatic ecosystem direction. Similarly, the Old-Growth Forests section states “No need to change identified,” directly contradicting the Forest Service’s own 2023 research and the final Species of Conservation Concern Assessment, both of which recommended modifications to increase old-growth protections.

These contradictions undermine public confidence in the Forest Plan revision process. TU requests that the Forest Service reconcile these statements with its assessment findings and explain any discrepancies in a revised version of the Preliminary Draft Plan Content that is made available for public review and comment before proceeding with the Draft EIS.

4. **Forest Plan content should consistently align with the Tongass Advisory Committee (TAC) Final Recommendations.** The 2015 TAC recommendations were developed at the direction of a federal charter by a group of 15 members representing the timber industry, conservation community, Alaska Native interests, government, and other groups. The recommendations were “crafted to hold together as a package rather than to be used as a menu of ideas to pick and choose from.” The revised Forest Plan should consistently apply the full suite of TAC recommendations to the revised Forest Plan, including the young-growth transition timeline, high-value fish watershed protections, and the

conservation framework that underpins the transition. Throughout these comments, we identify areas where the draft plan content diverges from the TAC recommendations.

5. **The revised Forest Plan must include a robust adaptive management framework.** The 2012 Planning Rule requires that plans include a monitoring program to evaluate whether plan components are effective and to inform adaptive management (36 C.F.R. § 219.12). Given the pace of changes on the Tongass—rising temperatures, shifting precipitation patterns, increasing atmospheric river frequency and intensity, glacier retreat, and changing ocean conditions—the revised plan cannot rely on static management prescriptions written for conditions that may not persist through the planning period. The plan must include an adaptive management framework with clear triggers for management response when monitoring indicates that desired conditions are not being achieved or that ecological conditions are deteriorating.

Trout Unlimited recommends including the following elements in the adaptive management framework:

- Defined monitoring indicators tied to each set of plan components, with measurable thresholds that trigger management review;
- A process for adjusting standards and guidelines when monitoring reveals they are insufficient to maintain desired conditions, without requiring a full plan amendment;
- Explicit integration of climate change projections into management triggers — for example, if stream temperatures exceed thresholds at monitoring sites, riparian zone management should be evaluated and strengthened;
- A commitment to transparent public reporting of monitoring results and adaptive management decisions. The 2012 Planning Rule’s biennial monitoring evaluation reports provide the procedural vehicle for this, but the plan must include the substantive triggers and thresholds that give the monitoring program accountability.

In the draft plan components that follow, TU has suggested monitoring indicators that are intended to integrate with the forest-wide monitoring program and provide the basis for adaptive management at the management area level.

C. Potential Management Areas

Key Fisheries Watersheds

Given the economic, social and cultural importance of salmon in Southeast Alaska, it is imperative that the revised plan includes a management area purpose-built for producing more wild salmon.

In responding to the notice of intent, Trout Unlimited strongly supported the proposed Conservation Watersheds as a starting place for a management framework and urged the Forest Service to use the Tongass 77 watersheds, TNC/Audubon Priority Conservation Areas, and Inventoried Roadless Areas—the most rigorously identified sets of high-value fish and wildlife lands on the forest—as the foundation for building the

Conservation Watersheds management areas. Additionally, we urged the Forest Service to include areas with high restoration potential—including at a minimum any areas with a Watershed Restoration Action Plan—among the lands identified in a habitat-focused management area. This framework is characterized as the proposed Key Fisheries Watersheds in the Preliminary Draft Plan Content.

Key Fisheries Watersheds effectively integrate the NOI's stated goals

The proposed Key Fisheries Watersheds Management Area address multiple Need for Change goals simultaneously:

- These high-value watersheds directly support Goal #2 (local and regional prosperity) by producing salmon that fuel Southeast Alaska's \$1 billion fishing economy and 10 percent of regional jobs.
- They advance Goal #3 (recreation and tourism) because these are the scenic, fish-rich landscapes that draw visitors and sustain outdoor recreation and tourism businesses.
- They serve Goal #5 (subsistence) because T77 watersheds are critical subsistence harvest areas for salmon and other resources.

Key Fisheries Watersheds are not a single-issue management area; they are the management area proposal that most effectively integrates the NOI's stated goals.

The building blocks of Key Fisheries Watersheds are already in place

The Tongass 77 are some of the "best of the best" from the thousands of salmon and trout watersheds on the Tongass. During the planning process for the 2016 Plan Amendment, researchers from the Alaska offices of Trout Unlimited, the Audubon Society, and The Nature Conservancy—in consultation with federal and state biologists, various community and business stakeholder groups—identified the most important salmon-producing watersheds that lacked broad watershed-scale protections. These areas support salmon runs that fuel the outdoor recreation and visitor industries, the commercial fishing sector, and rural subsistence. This analysis was closely aligned with and helped inform the recommendations of the Tongass Advisory Committee, a Federal Advisory Committee convened to guide the amendment process (Tongass Advisory Committee, 2015). Now narrowed down to 73 watersheds comprising nearly 1.9 million acres, the Tongass 77 form the backbone of Southeast Alaska's salmon fisheries and play a vital role in the regional economy.

The Tongass 77 enjoys support from more than 300 businesses and organizations, most of which are based in Southeast Alaska (Trout Unlimited, 2015). Similarly, TNC/Audubon Conservation Priority Areas were identified through a thorough peer-review process conducted by scientists from Audubon Alaska and The Nature Conservancy. These areas are the most ecologically valuable for a diverse array of plant and animal species, and their conservation is essential to the ecological health and function of Southeast Alaska.

The federally-chartered Tongass Advisory Committee (2015) recognized this when it recommended that the Forest Service "limit the old growth timber base to the current definition of Phase 1 lands outside of The Nature Conservancy (TNC)/Audubon priority conservation areas, Tongass 77 (T77) watersheds and Inventoried Roadless Areas." The 2016 Tongass Land Management Plan Amendment sought to implement these recommendations by identifying these areas as not suitable for old-growth logging.

Considerations for developing Key Fisheries Watersheds

The scientific case for building a fish-focused management area has grown even stronger since the 2016 Plan Amendment. Bellmore et al. (2024) recommends prioritizing the conservation of unimpaired watersheds that support current and expected future salmon productivity—a framework that maps directly onto the proposed Key Fisheries Watersheds.

In the revised Forest Plan, T77 watersheds, TNC/Audubon areas, and inventoried roadless areas should be identified as not suitable for timber production and should form the core of the Key Fisheries Watersheds management area.

Updates and additions to the T77 watersheds should be considered based on new information, including feedback from commercial and subsistence harvesters, and areas of projected climate refugia and glaciated systems forecast to become more productive as glaciers recede. The Forest Service should incorporate metrics of salmon habitat productivity into the Key Fisheries Watersheds framework through plan components and monitoring provisions.

Key Fisheries Watersheds should also allow recreation, outfitters and guides, cultural and subsistence activities, and restoration projects—uses that are compatible with the watershed conservation and restoration objectives.

In early 2023, the Tongass National Forest rolled out the Fish Passage Restoration project, a forest-wide initiative to remediate aquatic organism passage at nearly 700 stream crossings that do not meet Forest Service and State of Alaska fish passage standards. These impaired crossings affect an estimated 154 miles of upstream fish habitat, of which 33 miles are anadromous and 121 miles are resident fish habitat. Remediating these crossings will reconnect fragmented habitat, improve water quality by reducing erosion and sedimentation, improve hydrologic function, and reduce the threat of landslides—while also ensuring that roads and other infrastructure are durable and resistant to damage from flooding and a changing climate.

The Preliminary Draft Plan Content provides only minimal direction for Key Fisheries Watersheds, stating that these areas would receive “additional direction” to conserve watersheds with “extraordinary fisheries values” and to support salmon habitat, populations, and subsistence use. That language is a start, but it is far too vague to provide meaningful safeguards.

Trout Unlimited offers the following guiding principles for the development of specific Key Fisheries Watersheds components:

- **Lands within Key Fisheries Watersheds are not suitable for timber production.** The fisheries, subsistence, recreation, and cultural values of these watersheds far exceed their timber value, and managing them for timber production creates unacceptable risks to aquatic ecosystem integrity.
- **Key Fisheries Watersheds objectives are inconsistent with commercial timber harvest except for restoration purposes.** Where harvest demonstrably improves fish habitat—for example, variable-density thinning to accelerate old-growth structural characteristics in previously logged riparian areas—it may be appropriate, but it should not be driven by timber volume targets.
- **No new road construction or reconstruction should be allowed within Key Fisheries Watersheds.** Roads are the single largest source of chronic aquatic degradation on the Tongass, contributing

sediment to streams, creating fish passage barriers, and altering watershed hydrology. New road construction in the highest-value salmon watersheds is incompatible with the conservation purpose of the designation. Instead, attention should be focused on addressing fish passage barriers, erosion, and public safety concerns in existing road networks in these areas.

- **Fish passage must be maintained or improved at all stream crossings. The 100 highest priority existing barrier culverts within Key Fisheries Watersheds should be replaced within 10 years.** The Tongass National Forest has identified approximately 700 impaired crossings affecting an estimated 154 miles of upstream fish habitat. Key Fisheries Watersheds should receive priority for this work.
- **Management activities shall not alter natural hydrologic regimes.** More specifically, management activities shall not increase peak flows or alter base flows beyond the natural range of variation.

A dedicated fisheries watershed designation is essential, even with stronger stream buffers

Both stronger riparian buffers and a dedicated fisheries watershed designation are necessary to maintain healthy fish habitat. Riparian buffers and watershed-scale designations serve fundamentally different ecological functions. Buffers protect the stream corridor, the immediate interface between land and water. A designation like Key Fisheries Watersheds protects the watershed as a functioning hydrologic system, including upslope processes, road density, land use intensity, and cumulative effects that no buffer width can address.

The scientific literature is clear that both site-specific riparian buffers and watershed-scale conservation measures are required to maintain salmon productivity over the long term. The Aquatic Conservation Strategy of the Northwest Forest Plan pairs riparian reserves with key watershed designations for precisely this reason. After more than 20 years of implementation, the evidence shows that key watersheds are in better condition than non-key watersheds, precisely because the designation focused management attention and restoration resources where they were needed most (Reeves et al, 2018). Key Fisheries Watersheds should do the same for the Tongass.

Proposed plan components

To assist the Forest Service in developing the Key Fisheries Watersheds designation, TU offers the following proposed plan components.

Proposed Plan Components: Key Fisheries Watersheds (MA-FISH)

Description and Values. Key Fisheries Watersheds are those Tongass watersheds with the highest current and projected future value for wild salmon production, aquatic ecosystem integrity, and fisheries-dependent economic activity. They encompass the Tongass 77 watersheds, TNC/Audubon Priority Conservation Areas, and additional watersheds identified through analysis of salmon productivity, watershed intactness, climate refugia potential, and the presence of at-risk or culturally significant fish populations. These watersheds produce a disproportionate share of the region's wild salmon, which underpins commercial and sport fisheries, subsistence harvests, tourism, and the cultural identity of Southeast Alaska communities. Managing these watersheds to maintain their ecological integrity and fisheries productivity is essential to the long-term economic growth of the region.

Need to Change. There is a need to identify, conserve and restore the watersheds that contribute most to salmon production and fisheries-dependent economic activity, and to provide management direction that prioritizes the conservation and restoration of aquatic ecosystem integrity within those watersheds.

Desired Conditions (MA-FISH-DC)

- 01 Key Fisheries Watersheds exhibit high ecological integrity, with natural hydrologic regimes, high water quality, diverse and connected aquatic habitats, and self-sustaining populations of salmon and other native fish species. Watershed conditions support robust commercial, recreational, and subsistence fisheries.
- 02 Riparian areas within Key Fisheries Watersheds are predominantly in late-successional condition, providing large woody debris recruitment, stream shading, bank stability, and nutrient inputs that sustain productive fish and wildlife habitat.
- 03 Aquatic connectivity is maintained throughout Key Fisheries Watersheds. All stream crossings provide unimpeded passage for all fish species and life stages at all biologically relevant flows. There are no human-caused barriers to fish migration.
- 04 Key Fisheries Watersheds serve as climate refugia, with cold-water inputs, intact riparian canopies, and hydrologic diversity that provide fish with refuge and buffer aquatic habitats from the effects of rising air and water temperatures.
- 05 Road density within Key Fisheries Watersheds is minimized. Where roads exist, they are maintained to prevent chronic sediment delivery to streams, provide aquatic organism passage, and maintain subsistence and recreational access.

Goals (MA-FISH-G)

- 01 Prioritize Key Fisheries Watersheds for restoration funding and project delivery, focusing on fish passage barrier removal, road decommissioning, riparian restoration, and floodplain reconnection.
- 02 Collaborate with research institutions, Tribal partners, and conservation organizations to monitor watershed condition and fish habitat metrics within Key Fisheries Watersheds on a five-year cycle and use monitoring results to inform adaptive management.
- 03 Develop projects to decrease the density and presence of roads over time.

Objectives (MA-FISH-OB)

- 01 Within 10 years of plan approval, replace or remove all stream-crossing structures within Key Fisheries Watersheds that do not meet current fish passage standards.
- 02 Within 5 years of plan approval, complete all *existing* watershed restoration action plans within Key Fisheries Watersheds rated as functioning at risk or with declining aquatic habitat condition indicators.

- 03 Within 10 years of plan approval, complete all *new* watershed restoration action plans within Key Fisheries Watersheds rated as functioning at risk or with declining aquatic habitat condition indicators.

Standards (MA-FISH-STD)

- 01 Lands within Key Fisheries Watersheds are not suitable for timber production.
- 02 No new permanent or temporary road construction or reconstruction within Key Fisheries Watersheds.
- 03 No commercial timber harvest within Key Fisheries Watersheds. Precommercial thinning should be allowed for restoration where the primary objective is to improve fish and wildlife habitat or accelerate the development of late-successional riparian conditions, and where no net reduction in large woody debris recruitment will result.
- 04 All new stream crossings within Key Fisheries Watersheds shall provide passage for all native fish species and life stages at all biologically relevant flows, using USFS or USFWS techniques.
- 05 Management activities within Key Fisheries Watersheds shall not alter stream temperatures, flow, or timing in fish-bearing waters.
- 06 Management activities within Key Fisheries Watersheds shall not alter the magnitude, timing, or duration of peak or base flows beyond the natural range of variation. The natural hydrograph should be maintained.

Guidelines (MA-FISH-GL)

- 01 Existing roads within Key Fisheries Watersheds that are no longer needed for management or public access should be decommissioned and restored to reduce chronic sediment sources and restore natural drainage patterns.
- 02 Recreational use of Key Fisheries Watersheds should be managed in a manner consistent with maintaining water quality, streambank stability, and fish habitat and productivity, with particular attention to motorized access and commercial activity or operations near fish-bearing streams.
- 03 When authorizing mineral exploration or mineral development activity within Key Fisheries Watersheds, ensure that all applicable standards for water quality, sediment, and fish passage are met and that bonding is sufficient to cover full site restoration.

Monitoring

Key Fisheries Watersheds should be included in the plan monitoring program with the following indicators assessed on a five-year cycle: watershed condition class (using the Forest Service Watershed Condition Framework); fish passage status at all stream crossings; road density and road condition; riparian vegetation condition and successional stage; instream large woody debris frequency; stream temperature; and an index of salmon spawner abundance or juvenile density where data are available.

Old-Growth Management Area

Old-growth forests are the defining ecological feature of the Tongass and provide irreplaceable functions for fish habitat, including large woody debris recruitment for stream complexity, canopy cover for temperature regulation, and watershed stability.

The Preliminary Draft Plan Content states that there is “No need to change identified for this resource in the Assessment,” yet the agency’s own research, “Relevance and Need for the Tongass Old-Growth Conservation Strategy” (Berkley et al. 2023), rejected the idea of maintaining the current old-growth conservation strategy as-is. That publication recommended modifying the OGCS to increase old-growth protections. The final Species of Conservation Concern Assessment, published in June 2025, cited this finding, stating that the strategy “is still relevant and necessary, albeit with modifications, to provide a solid basis for the conservation of old-growth dependent species.” The Preliminary Draft Plan Content does not mention the Berkley 2023 review anywhere. TU urges the Forest Service to acknowledge and incorporate these findings.

Old-growth management is intrinsically linked to aquatic conservation. Old-growth forests are not solely a terrestrial resource; they are essential to aquatic ecosystem function. Riparian old-growth provides the large woody debris, stream shading, and bank stability that fish populations depend on. The agency’s own research documents that fish find greater refuge from stressful low-flow summer conditions in watersheds retaining more than 42 percent old-growth cover (Flitcroft et al. 2022). The old-growth management area must therefore include meaningful aquatic safeguards.

TU also reiterates its longstanding recommendation that the Forest Service cease its practice of implementing project-specific plan amendments to erode the boundaries of conservation lands. In previous timber sales, including Big Thorne and Saddle Lakes, project-specific amendments reduced the size and quality of old-growth reserves. Conservation land designations must have durable boundaries that are not adjusted to accommodate individual timber sales.

TU offers the following proposed plan components for the Old-Growth management area, with particular emphasis on aquatic protections that complement Key Fisheries Watersheds and forest-wide Riparian Management Zone standards.

Proposed Plan Components: Old-Growth Management Area (MA-OGRW)

Note: These proposed components supplement the desired conditions and goals already articulated in the Preliminary Draft Plan Content for this resource area. TU supports the existing desired conditions and offers additional standards, guidelines, and objectives to give them operational meaning.

Desired Conditions (MA-OGRW-DC)

- 01 Old-growth stand habitat characteristics are maintained and restored. Old-growth management areas retain old-growth forest characteristics, including large-diameter trees, multi-layered canopies, abundant snags and downed wood, and diverse understory communities. Where past management has altered these characteristics, conditions are trending toward recovery of old-growth structure and function.

- 02 Watersheds within old-growth management areas maintain high ecological integrity, with natural hydrologic regimes, high water quality, and aquatic habitat conditions that support self-sustaining populations of salmon and other native fish species. Riparian old-growth provides large woody debris, stream shading, and bank stability at levels within the natural range of variation.
- 03 Old-growth management areas function as core habitat reserves within a landscape-scale conservation network, providing habitat connectivity for old-growth-dependent species and contributing to the ecological resilience of the broader forest ecosystem.
- 04 Maintain the abundance, distribution, and landscape-scale connectivity of old-growth stands and their habitats to sustain natural ecological processes and viable populations of associated native species like salmon and deer.
- 05 Old-growth stands are resilient, maintaining and recovering their defining structural complexity and ecological functions naturally or through adaptive processes following disturbance and under changing future conditions. These forests also continue to support cultural practices, subsistence uses, and recreation opportunities that connect communities to the land.

Goals (MA-OGRW-G)

- 01 Collaborate with research institutions to monitor the effectiveness of the old-growth conservation strategy and to incorporate new scientific information into adaptive management, consistent with the recommendations of Berkley et al. (2023).
- 02 Prioritize the restoration of previously harvested areas within old-growth management areas—particularly degraded riparian zones—as both a fish habitat investment and an old-growth recovery strategy, recognizing that restoring old-growth conditions in riparian areas directly improves large woody debris recruitment, stream shading, and salmon habitat quality.

Objectives (MA-OGRW-OB)

- 01 Within 15 years of plan approval, restore at least 50 percent of previously harvested lands within old-growth management areas through treatments designed to accelerate the development of old-growth structural characteristics, prioritizing areas within riparian zones and Key Fisheries Watersheds.

Standards (MA-OGRW-STD)

- 01 Lands within old-growth management areas are not suitable for timber production.
- 02 No harvest of old-growth timber within old-growth management areas.
- 03 No new permanent or temporary road construction within old-growth management areas.
- 04 Management activities within old-growth management areas shall not degrade watershed integrity or fish habitat function.
- 05 All riparian management zone standards apply within old-growth management areas.

- 06 The boundaries of old-growth management areas shall not be modified through project-specific plan amendments to accommodate timber sale planning or other extractive activities.

Guidelines (MA-OGRW-GL)

- 01 Previously harvested areas within old-growth management areas should be prioritized for restoration treatments, including variable-density thinning, that accelerate the development of old-growth structural characteristics, particularly in riparian zones where recovery of large woody debris recruitment and stream shading functions is a priority.
- 02 Recreational use within old-growth management areas should be managed to maintain old-growth character, scenic values, and wildlife habitat, with particular attention to trail design and facility placement that minimizes impacts to old-growth structure and soils.

Monitoring

Old-growth management areas should be included in the plan monitoring program with indicators including: acres of old-growth by structural stage; acres treated for restoration of old-growth characteristics; road density; watershed condition class; and an evaluation of whether old-growth management area boundaries have been maintained without project-level modification.

Recreation-focused Management Areas

TU appreciates the Forest Service's effort to address outdoor recreation and tourism in the management area framework. The visitor industry is the largest private-sector employer in Southeast Alaska, and guided sport fishing alone generates \$202 million in direct spending and supports 1,750 jobs across the region (SEAGO/McKinley Research Group, 2025).

Seventy-four percent of guided fishing activity is driven by anglers who travel to Southeast Alaska specifically to fish, and remote fishing lodges account for nearly two-thirds of all guided angler days and 88 percent of direct sport fishing spending (SEAGO/McKinley Research Group, 2025). The quality of these fishing experiences—which depend directly on healthy fish habitat, clean water, abundant wild salmon and trout, and remote, uncrowded landscapes—is what draws these visitors and the economic activity they bring with them.

Trout Unlimited shares the concerns raised by the Tongass Recreation Partnership and other recreation interests that the proposed High Commercial Recreation Use (HCRU) and Low Commercial Recreation Use (LCRU) management areas may not yet reflect the scale and diversity of outdoor recreation occurring on the Tongass. The underlying Recreation Opportunity Spectrum classes have not been mapped, and the Forest Service has not yet articulated a clear vision for how these management areas would function in practice — what uses would be allowed, how conflicts would be resolved, and how the areas were delineated. Until that foundational work is completed, TU is cautious about endorsing the specific boundaries and direction of these management areas.

Rather than offering detailed plan components for MA-HCREC and MA-LCREC at this stage, TU offers the following considerations that should guide the development of recreation-focused management areas as the plan revision progresses.

1. The Forest Service should complete the Recreation Opportunity Spectrum mapping and engage with communities, recreation businesses, and partners before finalizing recreation management area boundaries and direction. Management areas should follow from a clearly articulated vision for outdoor recreation management on the Tongass, not precede it.
2. Any recreation management framework must protect the fish and wildlife habitat, water quality, and scenic values on which the recreation economy depends. These conditions are not a backdrop to the recreation experience—they are the product. If fish habitat is degraded, sport fishing businesses lose clients. If old-growth is logged in a viewshed, remote lodges, cruise lines, and tour companies lose the wilderness character their guests are paying for. If streams are silted by roads, angling opportunity is diminished. Recreation management areas should carry enforceable standards and guidelines for aquatic resources, not merely desired conditions.
3. Trout Unlimited is concerned that the proposed Low Commercial Recreation Use management area does not provide sufficient coverage to protect the remote, semi-primitive recreation settings that are most important to dispersed recreation users, including anglers, hunters, subsistence harvesters, small-ship operators, and backcountry users. These settings are defined by their unroaded character, low visitor density, and intact habitat. Whether the Forest Service uses LCREC, Community Use Areas, or another designation, the plan must ensure that the remote landscapes most valued by dispersed and remote recreation users receive management direction that maintains their semi-primitive character and prevents their incremental conversion to higher-intensity use.

In particular, TU recommends the Forest Plan direct that any Inventoried Roadless Areas be managed consistent with maintaining their remote, semi-primitive recreation character. Roadless areas are, by definition, the settings that dispersed recreation users value most. Ensuring these areas receive appropriate plan-level direction is in the best interest of the public.

4. Recreation management areas should address the potential for conflict between commercial recreation and non-commercial uses, including local recreation, subsistence, and personal-use fishing and hunting. These conflicts are real and growing across Southeast Alaska. Management direction should ensure that commercial recreation growth does not displace local users from traditional recreation and subsistence areas, consistent with ANILCA provisions.
5. Lands that are intended to protect remote and semi-primitive recreation settings should not be suitable for timber production, and new permanent road construction should not be authorized. The primary threats to remote recreation values are ground-disturbing, non-recreation activities—including timber harvest and road construction—that fundamentally alter the landscape character and ecological conditions these areas are designed to maintain.
6. Recreation management areas should include aquatic resource safeguards. Where recreation management areas overlap with Key Fisheries Watersheds, the MA-FISH standards for water quality, sediment, fish passage, and hydrologic integrity should apply. Recreation is a compatible and economically valuable use in these watersheds when managed to avoid adverse impacts on aquatic resources. TU notes the Tongass Recreation Partnership's observation that "wild salmon and their

freshwater habitat are important recreation resources on the Tongass.” We agree, and we believe the plan should make this connection explicit.

7. Finally, the Forest Service should analyze how prioritizing outdoor recreation management could support the objectives detailed in the Need for Change. The draft EIS should include a thorough economic analysis of the recreation and tourism sector under each alternative, with the same rigor applied to the timber economic analysis.

D. Preliminary Forest-wide Direction

Riparian Management Zones (RMZ)

Riparian Management Zone (RMZ) direction offers enforceable site-specific safeguards for fish habitat in the Forest Plan. Riparian buffer widths, activity restrictions, and restoration requirements directly determine what happens on the ground next to every stream, lake, and wetland on the Tongass.

The Preliminary Draft Plan Content establishes desired conditions for instream habitat, channel form, water quality, large wood, floodplain function, and riparian composition, and provides a table of buffer widths by process group and stream class. The current framework uses 100-foot no-harvest buffers for certain Class I and Class II streams, which are inadequate.

TU recommends that the Forest Service expand riparian buffer widths to reflect the best available science and current practice on other national forests. The current 100-foot buffers date from the early 1990s and are outdated. The 2012 Planning Rule requires that plans establish buffer widths and give “special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes,” but 100 feet is a floor, not a ceiling.

For example, the Aquatic Conservation Strategy in the Northwest Forest Plan requires riparian reserves of two times the site-potential tree height on fish-bearing streams, with a minimum of 300 feet, and one full site-potential tree height on non-fish-bearing perennial streams. Reserves extend to the edge of the 100-year floodplain. This framework was designed by the Forest Ecosystem Management Assessment Team, adopted in the 1994 Record of Decision, and has been shown over 23 years to improve watershed conditions across the plan area.

The Inyo National Forest Land Management Plan, adopted in 2018 under the 2012 Planning Rule, establishes Riparian Conservation Areas (RCAs) of 300 feet on perennial streams and 150 feet on intermittent and ephemeral streams, measured from the bankfull edge. It also designates equipment exclusion zones at half the RCA width and includes enforceable standards requiring fish passage at all stream crossings, prohibiting activities that adversely affect water temperatures, and requiring that all new or replaced stream crossings accommodate at least the 100-year flood.

Tongass-based research specifically supports wider buffers. Flitcroft et al. (2022) documented that large wood is decreasing in Tongass streams regardless of management history, and that fish may have greater opportunities for refuge in watersheds with greater than 42 percent old growth. Moore et al. (2024) found

persistent effects of past timber harvest on stream habitat across 30 years of monitoring on the Tongass. These findings indicate that current buffers are insufficient to sustain healthy and abundant fish populations.

The plan should include mandatory restoration direction for degraded riparian areas, not merely discretionary guidance. The agency's own research documents declining large wood and persistent harvest legacies in Tongass streams (Flitcroft et al. 2022; Moore et al. 2024). Degraded riparian areas should be identified and prioritized for restoration with measurable objectives and timelines.

Trout Unlimited also reiterates its 2015 recommendation that no-cut buffers should apply to all anadromous water bodies, including lakes, ponds, and wetlands. Under the current standards and guidelines, logging is allowed right up to the shoreline of some anadromous waters. Logging adjacent to anadromous lakes and ponds can adversely affect sediment loading, large woody debris recruitment, stream shading, and water temperature. For all the same reasons that no-cut buffers apply to anadromous streams and rivers, they should also apply to anadromous lakes, ponds, and wetlands.

Finally, buffer widths should account for the changing climate. The Forest Service Land Management Planning Handbook directs forest planning teams to evaluate "the effects of climate change on stream flows that may affect the size of riparian management zones" (FSH 1909.12, Chapter 20). Given projected increases in precipitation intensity, atmospheric river frequency, and stream temperatures on the Tongass, wider buffers are warranted as a climate adaptation measure as well as a fisheries conservation measure.

Trout Unlimited offers the following proposed plan components for riparian management zones.

Proposed Plan Components: Riparian Management Zones (FW-RMZ)

Note: These proposed components supplement the desired conditions and goals already articulated in the Preliminary Draft Plan Content for this resource area. TU supports the existing desired conditions and offers additional standards, guidelines, and objectives to give them operational meaning.

Riparian buffer widths. Trout Unlimited supports the following no-cut buffer widths:

- **Fish-bearing streams (Class I) and all anadromous water bodies, including anadromous lakes, ponds, and wetlands: 300 feet on each side, measured from the bankfull edge of the stream or the ordinary high-water mark of the water body, or to the edge of the 100-year floodplain, whichever is greater.**
- **Perennial non-fish-bearing streams (Class II): 150 feet on each side, measured from the bankfull edge.**
- **Intermittent streams (Class III): 100 feet on each side, measured from the bankfull edge.**
- **Where site-potential tree height exceeds the fixed distances above, the buffer width shall be no less than one site-potential tree height.**

Buffers may be adjusted at the project level only if the district or forest fisheries and hydrologist staff approve adjusted widths that will maintain or improve riparian and aquatic desired conditions.

Desired Conditions (FW-RMZ-DC)

- 01 Riparian Management Zones function as intact ecological buffers between upland management activities and aquatic ecosystems. Riparian vegetation is predominantly in late-successional condition, providing large woody debris recruitment, stream shading, bank stability, sediment filtration, and nutrient cycling at levels consistent with the natural range of variation.
- 02 Water quality within and downstream of Riparian Management Zones meets or exceeds state water quality standards. Stream temperatures, chemical composition, and sediment loads are within ranges that support native fish populations and other aquatic-dependent species.
- 03 Floodplains within Riparian Management Zones are hydrologically connected to their associated streams and rivers, supporting natural flood attenuation, groundwater recharge, and off-channel fish habitat.
- 04 Riparian Management Zones provide habitat connectivity for terrestrial and aquatic wildlife, functioning as movement corridors within and between watersheds.

Objectives (FW-RMZ-OB)

- 01 Within 15 years of plan approval, restore riparian ecological function on at least 150 miles of degraded riparian areas across the Tongass, prioritizing stream reaches within Key Fisheries Watersheds and priority restoration watersheds.

Standards (FW-RMZ-STD)

- 01 No timber harvest within Riparian Management Zones, except for restoration-purpose treatments where the primary objective is to improve riparian ecological function (such as variable-density thinning to accelerate late-successional structural characteristics in previously harvested stands), and where the treatment will not reduce large woody debris recruitment potential.
- 02 No new road construction within Riparian Management Zones except at designated stream crossings where no feasible alternative route exists. Stream crossings shall be designed to the minimum footprint necessary and shall provide passage for all native fish species and life stages.
- 03 No management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or deposits of sediment that seriously and adversely affect water conditions or fish habitat shall be permitted within Riparian Management Zones.
- 04 All new or replaced stream crossings within Riparian Management Zones shall accommodate at least the 100-year flood, including associated bedload and debris. Flood capacity estimates shall reflect the best available science regarding the projected effects of climate change on precipitation intensity and peak flows.
- 05 Equipment exclusion zones of 150 feet from the bankfull edge of Class I streams and 75 feet from the bankfull edge of Class II and III streams are established within Riparian Management Zones. Mechanical equipment may operate within equipment exclusion zones only for stream-crossing construction or maintenance, restoration activities, or emergency access, and only when ground

conditions (frozen or dry soil, adequate slash mat, or over-snow operation) prevent soil compaction and sediment delivery.

Guidelines (FW-RMZ-GL)

- 01 Degraded riparian areas within the Riparian Management Zones, particularly those with a legacy of past timber harvest, should be prioritized for active restoration to accelerate the return of late-successional structural conditions and the recovery of ecological functions including large woody debris recruitment and stream shading.
- 02 When designing harvest units adjacent to Riparian Management Zones, incorporate wind-firmness buffers to minimize accelerated windthrow. Where high-value aquatic resources are present, wider buffers should be used even when windthrow risk is judged to be low.

Monitoring

Riparian Management Zones should be included in the plan monitoring program with the following indicators: riparian vegetation successional stage and canopy cover; instream large woody debris frequency and size; stream temperature at representative monitoring sites; fine sediment levels in spawning substrates; and stream channel morphology (pool frequency, width-to-depth ratio). Monitoring should evaluate whether standards are being met and whether riparian conditions are trending toward desired conditions.

Watersheds and Water Resources (WTR)

The Watersheds and Water Resources section should establish the overarching framework for watershed condition assessment, protection, and restoration across the forest. Trout Unlimited recommends that the revised Forest Plan establish watershed condition classes tied to enforceable management triggers, not merely assessment. The plan should include a standard requiring that no new ground-disturbing activities be authorized in watersheds rated "functioning at risk" or "impaired" until a watershed restoration action plan is completed and funded. The plan should also adopt a net-improvement or no-net-loss standard for watershed condition across the planning period. This is the logical complement to the desired conditions already articulated in the draft plan components, which envision watersheds in properly functioning condition.

The plan should require cumulative effects analysis at the watershed scale for all projects affecting water quality, fish habitat, and hydrologic function. Project-by-project review systematically underestimates the aggregate effects of roads, harvest, and other activities on watershed processes. The 2012 Planning Rule's requirement to identify priority watersheds for maintenance or restoration should be implemented through overlap with the Key Fisheries Watershed designation and restoration needs identified in the agency's Aquatic Ecosystems Assessment, which found that aquatic habitat conditions have declined in 41 sub-watersheds.

We also recommend developing specific standards for sediment, temperature, and flow regime: management activities shall not increase chronic or episodic sediment delivery to fish-bearing streams above natural background levels; management activities shall not measurably increase stream temperatures in fish-bearing waters; and management activities shall not alter the magnitude, timing, or duration of peak or base flows beyond the natural range of variation.

Trout Unlimited offers the following proposed plan components for watersheds and water resources.

Proposed Plan Components: Watersheds and Water Resources (FW-WTR)

Note: These proposed components supplement the desired conditions and goals already articulated in the Preliminary Draft Plan Content for this resource area. TU supports the existing draft components and offers additional standards, guidelines, and objectives to give them operational meaning.

Standards (FW-WTR-STD)

- 01 Management activities shall not increase chronic or episodic sediment delivery to fish-bearing streams above natural background levels.
- 02 Management activities shall not measurably increase stream temperatures in fish-bearing waters.
- 03 Management activities shall not alter the magnitude, timing, or duration of peak or base flows beyond the natural range of variation.
- 04 No new ground-disturbing activities shall be authorized in watersheds rated as "functioning at risk" or "impaired" under the Watershed Condition Framework until a watershed restoration action plan has been completed and restoration actions are funded or underway.
- 05 Watershed condition across the planning area shall be maintained at or improved from baseline conditions established at the time of plan approval. Net degradation of watershed condition is not consistent with this plan.
- 06 Cumulative effects on water quality, fish habitat, and hydrologic function shall be analyzed at the watershed scale for all projects involving ground disturbance, vegetation removal, or road construction within or upstream of fish-bearing waters.

Objectives (FW-WTR-OB)

- 01 Within 5 years of plan approval, complete watershed restoration action plans for all priority watersheds identified under the Watershed Condition Framework and for all Key Fisheries Watersheds with aquatic habitat indicators rated as fair or poor.
- 02 Within 15 years of plan approval, improve the watershed condition class rating of at least 75 percent of watersheds currently rated as "functioning at risk," prioritizing areas within Key Fisheries Watersheds.
- 03 Within 15 years of plan approval, replace or remove the top 100 stream-crossing structures forest-wide that do not meet current fish passage standards, prioritizing crossings within Key Fisheries Watersheds and priority restoration watersheds.

Guidelines (FW-WTR-GL)

- 01 When multiple restoration needs are identified within a watershed, prioritize actions that address fish passage barriers, chronic sediment sources from roads, and degraded riparian conditions, in that order, unless site-specific analysis indicates a different priority sequence would achieve greater ecological benefit.
- 02 Watershed restoration action plans should be developed in coordination with local forest partnerships, restoration partners, and the Southeast Alaska Fish Habitat Partnership to leverage shared resources and ensure consistency with community priorities.

Monitoring

Watershed condition should be included in the plan monitoring program, with the following indicators assessed forest-wide on a five-year cycle using the Watershed Condition Framework: overall watershed condition class; aquatic habitat condition; road and trail condition; riparian and wetland vegetation condition; and water quality. Monitoring results should be used to update the list of priority watersheds and to inform adaptive management decisions regarding project authorization in at-risk watersheds.

Aquatic and Terrestrial Ecosystems (ECO)

The Tongass is an interconnected system. Salmon carry ocean nutrients into freshwater streams and up into the forest. Old-growth trees fall into streams and create the pools and cover that juvenile fish need to survive. Riparian forests shade the water and keep it cool enough for salmon to spawn. Wetlands filter runoff and buffer floods. When one part of this system is damaged—when a riparian forest is logged, a stream is choked with sediment, or a wetland is drained—the effects ripple through the whole ecosystem.

The preliminary forest-wide ecosystem desired conditions generally get this right. What is missing is a desired condition that names salmon as a keystone species linking aquatic, riparian, and terrestrial ecosystems. Salmon are not just one more species on the Tongass—they are the thread that ties the forest to the ocean and the economy to the land. The revised Forest Plan should say so.

Rivers and Streams (RVRS). The draft plan content says there is no need to change the current direction for rivers and streams. That claim does not hold up against the agency's own Aquatic Ecosystems Assessment, which acknowledged that the prior plan never evaluated aquatic ecosystem integrity as a whole and identified clear opportunities to strengthen direction. TU recommends adding standards requiring that natural channel form and sediment processes be maintained in fish-bearing streams, that pool habitat and spawning gravel not be degraded, and that every stream crossing provide fish passage for all species and life stages.

Riparian Forest (RPF). The desired conditions for riparian forest are well written, particularly the targets showing that nearly half of the riparian ecosystem should be in late-successional condition with trees over 111 years old. These old riparian forests are what keep streams healthy—they are the source of the large wood, shade, and bank stability that fish depend on. The standards TU proposes for Riparian Management Zones in Section D would give these desired conditions the enforcement teeth they need.

Tidal Wetlands and Estuarine (TWTLD). Estuaries are where juvenile salmon transition from freshwater to saltwater, and they are some of the most productive rearing habitat on the Tongass. The plan should include standards prohibiting development that disrupts estuarine hydrology or cuts off tidal channels, and prohibiting new log transfer facilities in estuarine zones. Where tidal channels have been disconnected by past development, the plan should direct their restoration.

Lakes and Ponds (LAKE). Lakes and ponds provide critical rearing habitat and cold-water habitat for salmon and trout. The plan should require that natural water levels and tributary connectivity be maintained. As TU has previously recommended, no-cut buffers should apply to all anadromous lakes and ponds. Under the current plan, logging is allowed right up to the shoreline of some waters where salmon rear.

Infrastructure, Facilities, and Access (IFA)

Roads and stream crossings are the primary source of chronic aquatic degradation on the Tongass. TU supports the preliminary desired conditions stating that transportation infrastructure should not extend stream networks artificially and should not preclude natural flow paths. We recommend converting these desired conditions to standards. TU also recommends standards requiring 100 percent fish passage at all stream crossings, consistent with the approach taken in the Inyo National Forest Plan. The plan should include an objective to replace all barrier culverts—the Tongass has identified 693 impaired crossings affecting 154 miles of upstream fish habitat—on a prioritized timeline, with all “red” crossings replaced within 15 years. Roads no longer needed for management or public access should be decommissioned.

Recreation and Tourism (REC)

Recreation and tourism are primary economic drivers of the Tongass. They depend on the same healthy fish and wildlife habitat, clean water, and scenic values that the plan’s conservation components are designed to protect. TU’s core constituency—recreational anglers, sport fishing guides, lodge owners, and hunting guides—directly experiences the consequences of forest management decisions every day. Every investment in fish habitat restoration, water quality, and watershed integrity is also an investment in the outdoor recreation and visitor industries.

Trout Unlimited supports the forest-wide desired conditions for recreation and tourism and offers the following additional recommendations. The plan should include a desired condition recognizing that fish and wildlife habitat quality is the foundation of the recreation economy. Maintaining a diverse range of recreation opportunities across the Recreation Opportunity Spectrum—from primitive and semi-primitive settings in roadless areas to developed settings near communities—is essential because different segments of the recreation economy depend on different settings. Concentrating all use into developed areas degrades the uncrowded, high-quality experiences that command premium visitor spending and distinguish Southeast Alaska from other destinations.

Consistent with the Tongass Recreation Partnership’s recommendations, the plan should include forest-wide direction to build and maintain trails and recreation infrastructure, to manage recreation staffing and resources commensurate with the scale and growth of recreation demand, and to support locally based businesses that drive rural prosperity. Scenic Integrity Objectives should be aligned with the Recreation Opportunity Spectrum and should apply to impacts from all forest uses, not just timber projects.

The plan should also include direction addressing visitor capacity. Where monitoring indicates that recreation use is degrading fish habitat, water quality, streambank stability, or the quality of recreation experience, the Forest Service should have the authority and obligation to act—not merely the discretion to consider the problem.

Socio-Economic Management (ECON)

The socio-economic section must be updated to reflect the actual economic structure of Southeast Alaska. The plan should include a desired condition stating that the Tongass National Forest contributes to a diverse, resilient regional economy in which fisheries, recreation, tourism, and subsistence are recognized as primary economic drivers alongside timber, minerals, and other extractive resources. The draft Environmental Impact Statement must include a comparative economic analysis of salmon and fisheries relative to timber production under each alternative, including full value-chain accounting for commercial harvest, sport fishing, processing, tourism, and subsistence replacement value.

Subsistence (SBST)

Salmon and deer are the foundation of rural subsistence in Southeast Alaska, and maintaining subsistence opportunity requires maintaining safeguards for important fish and wildlife habitat. As TU stated in our scoping comments, the word “consider”—used in the NOI’s subsistence goal—is inadequate. The federal government has legal obligations under ANILCA Title VIII and trust obligations to Alaska Natives to ensure that subsistence resources are available, and the revised Forest Plan should reflect that.

Timber and Timber Production (TBR/TBRP)

The revised Forest Plan should identify the following lands as not suitable for timber production: Key Fisheries Watersheds; Old-Growth Management Areas; Inventoried Roadless Areas; T77 watersheds and TNC/Audubon Priority Conservation Areas; LUD II areas; and riparian management zones at the expanded widths TU recommends in Section D.

TU supports an appropriately scaled young-growth timber program focused on selective harvest for the benefit of local communities and opposes large-scale clearcutting or exporting of young growth.

E. Preliminary Designated Areas

Inventoried Roadless Areas (DA-IRA)

The approximately 9 million acres of Inventoried Roadless Areas on the Tongass are among the most intact fish and wildlife habitat remaining in any national forest. These unroaded watersheds are the backbone of salmon production across the forest, providing critical habitat connectivity. They are also essential to the region’s fishing and tourism industries; the roadless character of these landscapes is what draws anglers, hunters, lodge guests, cruise ship passengers, and independent travelers to Southeast Alaska.

Public support for protecting roadless areas on the Tongass is overwhelming and well-documented. When the Forest Service last proposed changes to the Roadless Rule in Alaska, public comment at community meetings ran heavily in favor of keeping safeguards in place—in some communities, every single commenter supported the 2001 Roadless Rule. Polling has consistently shown that roughly 80 percent of Alaskans want to either keep the Roadless Rule as it is or make only minor changes offset by increased conservation measures. Numerous Tribes, communities, fishing organizations, tourism businesses, and conservation groups have passed resolutions or formally commented in support of maintaining roadless protections. The breadth of this support—crossing political, geographic, and economic lines—reflects a shared recognition that roadless areas are essential to Southeast Alaska’s economy and way of life.

The Preliminary Draft Plan Content states that Inventoried Roadless Areas should be managed to protect roadless area characteristics. TU supports this desired condition and recommends that it also be expressed as enforceable standards:

- Lands within IRAs should be identified as not suitable for timber production.
- No new permanent or temporary road construction should be permitted.
- No commercial timber harvest should occur except for restoration purposes consistent with maintaining roadless characteristics.
- Fish and wildlife habitat, including aquatic connectivity and watershed integrity, should be maintained.

The plan should explicitly recognize Inventoried Roadless Areas as high-value fish habitat strongholds. Unroaded, intact watersheds with cold-water inputs will become increasingly important as climate change degrades habitat conditions in more developed portions of the forest. Many of the Tongass’s most productive salmon systems—and many of the watersheds identified as T77 or TNC/Audubon Priority Conservation Areas—are located within IRAs. Maintaining roadless characteristics means maintaining quality fish and wildlife habitat.

Trout Unlimited also recommends that IRAs not designated under other management areas receive plan direction consistent with maintaining their remote, semi-primitive recreation character. Roadless areas support the dispersed recreation economy—remote lodges, fly-in fishing, backcountry hunting, small-ship tourism—and provide the settings that local residents value for recreation and rural subsistence.

Regardless of the status of the 2001 Roadless Rule, the revised Forest Plan must include plan-level conservation measures sufficient to maintain roadless character in these valuable and irreplaceable areas. The roadless areas of the Tongass belong to all Americans, and Southeast Alaskans—who recreate on these lands, earn a living on these lands, and harvest from them to feed their families—have spoken clearly and consistently in favor of their protection.

LUD II (DA-LUDII)

LUD II areas should remain predominantly roadless while maintaining and enhancing fish and wildlife habitat. Standards should prohibit new road construction and commercial timber harvest.

F. Preliminary Potential Activity

Recreation and Tourism Management

The Preliminary Draft Plan Content includes an activity-specific section on recreation and tourism management addressing habitat considerations, recreation special use permitting, trails, and water considerations from recreation activities. TU offers the following comments focused on the interaction between recreation activities and aquatic resources.

Recreation activities—including guided fishing, streamside camping, bear viewing, motorized boating, off-highway vehicle use, and trail construction—can cause localized impacts to streambank stability, riparian vegetation, water quality, and fish behavior. The draft plan content acknowledges some of these impacts but offers only general guidance. TU recommends that the following provisions be adopted as standards rather than guidelines: trail construction and maintenance within riparian management zones shall avoid increasing sediment delivery to fish-bearing streams, and trails crossing fish-bearing streams shall use hardened crossings designed to prevent erosion; recreation developments located within riparian management zones, including bear viewing platforms and overnight facilities, shall be sited and designed to avoid disturbance to spawning and rearing habitat; and off-highway vehicle use within 300 feet of fish-bearing streams and anadromous water bodies shall be prohibited or restricted to designated routes with adequate stream-crossing structures.

Recreation special use permitting should be streamlined with multi-year permit terms for established operators with demonstrated compliance records. Permit conditions for guides operating near fish-bearing streams should address group size, streambank disturbance, waste management, and use frequency. The permitting framework should support locally based businesses and should not inadvertently favor large outside operators over small local ones.

Timber Harvest Management

The activity-specific timber harvest management section contains the operative sideboards that determine what happens to fish habitat when timber sales are planned and executed. TU offers the following specific recommendations:

Lands not suitable for timber production. The plan should identify the following lands as not suitable for timber production: Key Fisheries Watersheds; Old-Growth Management Areas; Inventoried Roadless Areas; T77 watersheds and TNC/Audubon Priority Conservation Areas; LUD II areas; and riparian management zones at the expanded widths TU recommends in Section D.

Timber harvest standards for fish habitat. TU recommends converting several provisions to enforceable standards. No harvest should occur within Riparian Management Zones. Hydrologic recovery thresholds—including the limit that no more than 15 percent of a watershed may be in a hydrologically unrecovered condition—should be met before re-entry harvest. Harvest should be prohibited where it would increase peak flows or chronic sediment delivery to fish-bearing streams. And all stream crossings associated with timber harvest must provide full passage for aquatic organisms at all life stages and at all flow levels.

Young-growth harvest in riparian areas. While the TAC recommended allowing young-growth harvest within beach fringe and riparian management areas during the 15-year transition period, as TU noted in its 2015 comments on the Forest Plan Amendment DEIS, those recommendations were not subject to scientific review and could have unanticipated adverse consequences for fish and wildlife. These relaxed standards and guidelines were intended to cease once the transition period was complete.

TU recommends that the revised Forest Plan not allow young-growth harvest within Riparian Management Zones. If any harvest is permitted in RMZs, it should be limited to treatments that demonstrably improve riparian function, such as variable-density thinning to accelerate old-growth characteristics and large wood recruitment. Any compatible harvest should be subject to a standard prohibiting any reduction in large woody debris recruitment.

Log transfer facilities. These facilities can affect estuarine habitat, water quality, and juvenile salmon rearing areas. The revised plan should prohibit new transfer facilities in Key Fisheries Watersheds or within one mile of the Mean Lower Low Water (MLLW) terminus of anadromous fish streams, and should require decommissioning and restoration of existing LTFs in sensitive locations when they are no longer needed.

Road management. The plan should require the decommissioning of roads no longer needed for timber access or other management purposes within three years of project completion. Road density limits should be established by sub-watershed at the HUC14-level. And the plan should include an objective to replace all road-crossing structures that fail to meet fish passage standards within 15 years, with restoration work prioritized in Key Fisheries Watersheds.

The young-growth transition. The TAC recommended an enforceable young-growth transition schedule with accountability triggers. The revised plan should include a clear transition timeline consistent with the TAC recommendations, not just aspirational language about transitioning over time that is repeatedly delayed. Realistic economic analysis is essential. Historical Tongass timber sales have consistently lost money for taxpayers, and the draft Environmental Impact Statement must use realistic assumptions about timber demand, market prices, and program costs.

Project-specific plan amendments. The Forest Service should cease its practice of implementing project-specific plan amendments to facilitate timber sale planning at the expense of conservation lands. Conservation designations, including Key Fisheries Watersheds and Old-Growth management areas, must have durable boundaries that are not eroded by individual timber sales.

G. Species of Conservation Concern

TU also provides the following comments on the Draft Proposed Species of Conservation Concern (SCC) Report released concurrently with the Preliminary Draft Plan Content.

Chinook Salmon

The Draft Proposed SCC Report notes that Chinook salmon (*Oncorhynchus tshawytscha*, population 5, King Salmon River run on Admiralty Island) was originally recommended as an SCC, but was removed because the

species is currently a candidate for listing under the Endangered Species Act. TU understands the regulatory basis for this determination; ESA candidate species are excluded from the SCC process.

The SCC report states that if Chinook salmon are not listed under the ESA, they will be reconsidered as an SCC, and TU supports that commitment. Given the well-documented declines in Chinook salmon populations across their range and the significance of Tongass watersheds as rearing and migration habitat for transboundary Chinook stocks, it is essential that the plan revision process be prepared to incorporate Chinook salmon as an SCC—and to develop the plan components necessary to provide for their persistence—without delay if the ESA candidacy does not result in a listing.

TU recommends that the Forest Service begin developing draft plan components for Chinook conservation now, so that those components are ready for incorporation regardless of the ESA outcome.

Steelhead Trout

Trout Unlimited notes that steelhead (*Oncorhynchus mykiss*) was assessed during the SCC screening process and was found to not meet the initial criteria for consideration, based on NatureServe ranking thresholds.

TU respectfully requests that the Forest Service reconsider steelhead for SCC designation under the “local conservation concern” pathway described in FSH 1909.12, 12.52d(f), which allows species to be considered where the best available scientific information indicates local concern about the species’ capability to persist based on significant threats, declining trends, restricted ecological conditions, or low population numbers.

Steelhead populations on the Tongass are poorly monitored relative to their ecological and recreational importance. Escapement is tracked at only one weir site—the Situk River—and abundance is indexed at 10 snorkel survey sites (Alaska Department of Fish and Game, 2024). The coalition assessment comments submitted by Trout Unlimited and several other partners in 2025 documented that recent steelhead returns at monitored sites have been below average, following a period of especially high escapement from 2004 to 2007 that did not persist. No formal escapement goals exist for steelhead in Southeast Alaska, which means there is no management trigger if populations decline.

TU recognizes that the available scientific information on steelhead is limited. The SCC report found that 67 percent of aquatic species evaluated lacked sufficient information to make a determination, and this data gap is itself a concern. Steelhead face many of the same habitat-based threats as Chinook and other salmon species, including timber harvest effects on riparian habitat, road-related sedimentation and fish passage barriers, and climate-driven changes to stream temperature and hydrology. Their dependence on cold, well-oxygenated freshwater habitat for spawning and extended juvenile rearing—steelhead typically rear in freshwater for two to three years—makes them particularly vulnerable to cumulative habitat degradation.

At minimum, TU recommends that the Forest Service identify steelhead as an information need and prioritize steelhead monitoring and population assessment within the plan monitoring program, so that the data necessary for a future SCC determination is being collected.

Plan Components for Aquatic Species of Conservation Concern

The plan components proposed elsewhere in these comments—particularly those for Key Fisheries Watersheds, Riparian Management Zones, and Water Resources—would provide substantial habitat-based protections for all proposed and potential aquatic SCC, including hooligan (the sole aquatic species on the proposed SCC list), Chinook salmon, and steelhead. TU encourages the Forest Service to evaluate whether the ecosystem-level plan components proposed in these comments are sufficient to maintain viable populations of aquatic SCC, or whether additional species-specific components are needed, as per FSH 1909.12, 23.11.

H. Range of Alternatives

Trout Unlimited reiterates its scoping request for a salmon-focused alternative in the draft EIS—an alternative that manages the Tongass with an emphasis on maintaining and strengthening wild salmon production as the forest’s highest-value economic and ecological output. Such an alternative would center Key Fisheries Watersheds management area, expanded riparian management zones, a young-growth-only timber program, and habitat restoration as the organizing management framework. This alternative reflects the modern economic reality of Southeast Alaska, where fisheries, recreation, and tourism far outpace timber in employment, revenue, and community importance. We strongly urge the Forest Service to genuinely consider and analyze a salmon-centered management approach as part of a reasonable range of alternatives.

I. Conclusion

TU is committed to constructive engagement throughout the plan revision process. We appreciate the Forest Service’s work to date and recognize the challenges the agency faces in balancing competing demands on the Tongass. We also recognize the significant capacity constraints and staffing challenges the Tongass is experiencing, and we offer these comments in a spirit of partnership, with substantive input intended to help the Forest Service develop a plan that meets the needs of the public and local communities.

The revised plan must reflect the economic and ecological reality of the Tongass: Productive, intact fish and wildlife habitat is the foundation of Southeast Alaska’s economy. Salmon, fisheries, recreation, and tourism are the lifeblood of the region’s communities, and the plan must be built to sustain them.

We appreciate the opportunity to provide input during this comment period. We hope the plan revision process will regain some of the public trust that was lost by developing draft plan components without adequately considering the public feedback received during the scoping process. Trout Unlimited is committed to working collaboratively with the Forest Service to develop a lawful, durable, and fish-focused revised Forest Plan.

Please do not hesitate to reach out with any questions.

Respectfully,

A handwritten signature in cursive script that reads "Jen Leahy".



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