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Comments: Submitted via online portal

August 17, 2022

Christopher French

Deputy Chief

National Forest System, Forest Service

U.S. Department of Agriculture

Sidney R. Yates Federal Building

201 14th Street, SW

Washington, DC 20024

Re: Comments Regarding Executive Order 14072, Request for Information on Federal Old-Growth and Mature Forests, Docket Number: FS-2022-0003

Dear Deputy Chief French,

SalmonState thanks you for the opportunity to comment on Executive Order 14072, Request for information on federal old-growth and mature forests. These comments reflect the role that protected old growth forests play supporting economic activity, as well as recommendations for developing community-led local and regional economic development opportunities.

SalmonState, a seven-year-old initiative housed at NVF, works to protect habitat and promote policies that will guarantee Alaska remains the SalmonState; the home of the world's largest, healthiest and most abundant wild salmon resource, which provides culture, food, income, employment and recreation to Alaskans, Americans and the rest of the world.

I. Old Growth forests are already an important part of the working forest.

Protected old-growth and mature forests are essential components of a working forest and contribute to economic values. The Tongass National Forest provides an outstanding example of how protecting old growth supports the leading private sector economies of commercial fishing and tourism.

In the Southeast Alaska Sustainability Strategy, the USDA has recognized the value of old-growth forests and community-led development by ending the large-scale clear cutting of old-growth and identifying the need to shift agency priorities to focus on recreation, restoration, and resiliency.

Alaska's vibrant commercial and sport fishing sectors, and traditional harvest are based abundant wild salmon. Alaska still has the old growth forest habitat to support healthy, wild runs. The massive efforts to recover lost salmon runs in the lower 48 coastal states, which have declined in part due to logging practices, highlight the

need to protect remaining salmon habitat. The Tongass has more than 5,000 salmon streams and produces 80 percent of the commercial salmon harvest from Southeast Alaska, valued at \$60 million annually. Additionally, 25% of the West Coast's salmon catch comes from the Tongass. Commercial fishing contributes \$1 billion to Southeast Alaska's economy and is one of the region's largest employers, accounting for 8% of jobs and earnings.

Alaska's strong tourism economy is based on scenic and natural landscapes. Old-growth forests are part of this dramatic natural landscape and support iconic fish and wildlife populations that attracts more than one million visitors to the remote region every year. More than half of Alaska's visitors come to the Tongass National Forest, driving over \$1 billion in economic activity in the region and \$2.8 billion state-wide prior to the pandemic. Tourism in and around the Tongass National Forest accounted for 18 % of regional employment in 2019 is quickly recovering. We would like to see greater focus from the USDA on engagement with communities to develop community-led tourism and recreation plans and management that helps make tourism work for communities in the National Forest.

Alaska's culture is defined by access to the land, waters, and its abundant fish and wildlife. Old growth forests provide an important community resource as a place for customary and traditional uses, hunting, fishing, and other recreational activities that are important parts of our culture.

The Tongass is also a nationally and globally significant carbon sink, representing ~20% of the total forest carbon stock in the entire national forest system. The Tongass stores more than 1.5 times the 2019 US greenhouse gas emissions. Approximately half of this carbon is stored in old growth forests, in both soil and woody biomass. (DellaSala et al., 2020). Secretary Vilsack's June 23, 2022 memorandum to the Forest Service on natural climate solutions, should direct the agency to develop metrics for valuing carbon value of old growth forests.

II. Efforts in Southeast Alaska, such as the Southeast Alaska Sustainability Strategy, can guide efforts to develop recommendations for community-led local and regional economic development opportunities.

The USDA should support the OneUSDA approach and Southeast Alaska Sustainability Strategy.

The OneUSDA initiative has provided a framework to address community concerns that transcend the National Forest boundaries. The Southeast Alaska Sustainability Strategy is an example of how this is being implemented. We encourage the USDA to continue supporting Forest Service efforts to prioritize recreation, restoration, and resiliency by working on community-led priorities.

Today, the ecosystem services provided by old-growth forests are the foundation of the region's tourism and fishing economies. Past boom and bust old-growth timber harvest in Southeast Alaska left some rural communities economically stranded. Locally led efforts like The Sustainable Southeast Partnership and the USDA's Southeast Alaska Sustainability Strategy are examples of how to develop community-led, regional development strategies.

Co-management with Tribes: Co-management with sovereign Tribes provides a framework for beginning to address the exclusion and removal of Indigenous people from their traditional lands and past management actions that may have excluded Indigenous perspectives. The Forest Service should establish cooperative agreements with Tribes to develop shared priorities and allow Tribes to conduct agency monitoring and management tasks to create employment opportunities.

We encourage the USDA to use existing authorities, while supporting the development specific co-management authorities through the legislative process. In Bridges to a New Era parts 1 and part 2, Mills and Nie (2020, 2022) lay out existing authorities in public land law and Indian law that allow for cooperative input and management that can be used to begin achieving the benefits of co-management.

Pre-planning engagement with communities and stakeholders. NEPA planning provides an essential tool for protecting communities and the public good from environmental harm. However, agencies can do more to engage with communities in advance of planning efforts to develop shared priorities and collaborative direction. Agency culture, compounded by understaffing, tends to favor the clearly delineated process of NEPA planning, creating a situation where plans are developed out of the public eye and the public is put in a reactive position, rather than a collaborative position. Land management agencies must work with communities, Tribes, stakeholders in advance of initiating planning to identify priorities, compatible economic development opportunities, methods, and concerns.

Metrics that allow local communities share in the economic value of old growth. Old growth forests have real value in the economy, via sectors such as tourism and recreation, fish habitat, and carbon sequestration. We encourage the agency to develop metrics to capture the carbon sequestration and storage values, as well as recreation and fish values of old growth and mature forests and ensure that these benefits are shared locally.

Thank you for the opportunity for public engagement and to comment on the importance of maintaining old-growth and mature forests. We look forward to working with USDA further to protect Alaska's old-growth forests. Please contact Dan Kirkwood at dan@salmonstate.org with any questions related to these comments.

Sincerely,

Dan Kirkwood

SalmonState

dan@salmonstate.org

References

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