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Comments: Re: Request for information on federal old growth and mature forests (Executive Order 14072) #NP-3239 To Whom It May Concern: These comments are submitted on behalf of the Sitka Conservation Society (SCS), a grassroots conservation organization based in the Tongass National Forest of Southeast Alaska. Our mission is to protect the natural environment of the Tongass National Forest and to support the development of sustainable communities within Southeast Alaska. These two prongs of our mission are inherently tied, as the health of the natural environment around us is critical for the health of our local communities and the people who live in this region. Our membership is Southeast Alaskans, Alaskans, and Americans who use and depend on intact old growth forests for our economic livelihoods, cultural heritage, food and sustenance, spiritual and mental renewal and rejuvenation, physical health, and climate security. SCS is highly supportive of the Biden Administration's efforts to protect old growth forests and support the development and success of ground up, landscape level conservation and economic development initiatives. Protecting old growth forests in Southeast Alaska and across the nation is a crucial component of our national climate strategy and the most successful carbon sequestration method that we currently have. These comments will focus on the characteristics that make Southeast Alaska's old growth forests important, threats to old growth forests in the region, policies and pathways to address these threats, and recommendations for community-led local and regional economic development opportunities.

1. Old Growth Characteristics As per the Alaska Roadless Rule Citizen Advisory Committee's report¹ on characteristics in inventoried roadless areas in Alaska, the old growth forest stands in the Tongass National Forest are nationally and globally significant because they exist in quantities and extend across the landscape in Alaska like few other places on the planet. These forests support subsistence and traditional hunting and gathering, unique plant and wildlife populations, a significant volume of sequestered carbon and forest/soil processes that mitigate climate change and represent a globally significant reference landscape and intact old growth forest ecosystem. Much of the expansive areas of high quality intact habitat found in the Tongass function with all their native species and components, and contain an abundance of species that may be listed as endangered or threatened elsewhere on the continent. Invasive species are generally not present in these old growth forests, and they function as biological strongholds and refuges for many species, harbor a diversity of plant and animal communities, and serve as a globally significant example of a temperate rainforest ecosystem that is both utilized and conserved by the people that live within and adjacent to it. The old growth stands of the Tongass National Forest contain a vast network of streams and rivers that support multiple species of fish, including wild populations of all five species of Pacific salmon, which are important to local communities as a source of food and economic income via commercial fisheries, tourism, and guided recreational fishing. These fish are also critical to the ecosystem functions of the forests and provide an important source of nutrients for bears, birds, bugs, and the soil and trees themselves.

2. Threats to Old Growth Forests on the Tongass National Forest Logging and mining are significant threats to old growth forests in Southeast Alaska. On the Tongass, stands of nationally and globally significant old growth forests represent the last domestic old growth timber industry in the nation. The logging industry is still heavily subsidized by the federal governments, which builds roads on public lands for private companies to harvest timber from. Overwhelmingly, the harvest methods used in Southeast Alaska involve clearcutting old growth forests. The Biden administration recently called for an end to old growth logging through the implementation of the Southeast Alaska Sustainability Strategy. The industry has been in the process of transitioning to a predominantly second growth harvest paradigm since ~2010, but industry special interests, mill equipment, and high costs to retool mills for second growth has made industry reluctant to adopt necessary change. After over 60 years of clearcutting old growth forests and the ecosystem degradation that has occurred as a result, it is clear that the focus in the Tongass needs to be on protecting the remaining productive forests and old growth, sustainably using extremely high value 'monument trees' to support Alaska Native art and culture, developing a seven-generation, long-term management paradigm to support this cultural heritage for the generations to come, and restoring watersheds and ecosystems that have been damaged in past logging operations. Legislation governing mining in the United States has not significantly

been updated since the 1872 General Mining Law, when the majority of mining claims and prospecting was extremely small scale. This antiquated law allows clearcutting of old growth for mine preparation and development across millions of acres in Southeast Alaska. Mining laws need to be reformed to protect areas that are critical for cultural significance and practice of subsistence harvesting. Communities should also be given more power in permitting decisions that will affect their immediate vicinity, and drinking water supplies need to be protected. As the Biden administration pursues more mining to fulfill domestic mineral needs for the clean energy transition, it is important to weigh the carbon sequestered in the forests that would be cleared for mines and the impact on the communities next to these proposed projects. We cannot trade one boom and bust resource extraction paradigm for another and expect communities to prosper.³ Policies to address threats

One policy that should be developed to help guide appropriations and time management of agencies like the USDA is a carbon sequestration metric. The Tongass National Forest sequesters more than 40% of all the carbon stored by the United States' national forests², and is essential for our region, state, and nation's ability to mitigate climate change impacts and increase community resiliency. Measuring and documenting the carbon sequestration capacity and actual tons of carbon sequestered on the forested lands of the Tongass National Forest will help the agency communicate and evaluate how they are contributing to our nation's goals to tackle climate change, as well as our international commitments. Private sector carbon trading markets that started in California have pioneered methodologies that measure, inventory, and analyze carbon sequestration capacity on privately-owned lands across the West. Has the federal government developed its own techniques for inventorying and measuring the carbon sequestered in old growth and mature forests located on NFS lands?? Why are we so far behind the private sector in this research and accounting?The Forest Service is guided by the key performance indicators that are set by Congress, one of which is timber volume sold. This timber-harvest focused KPI is at odds with Southeast Alaska Sustainability Strategy, the return of Roadless protections, and the implementation of E.O. 14072. The agency needs to create new metrics that can be piloted within the region to account for the economic impact of the salmon generated by the Tongass NF, as well as the value of ecosystem benefits provided by inventoried roadless areas when they are managed for these outcomes. It seems that if the USDA has shifted its management goals for the Tongass National Forest and old growth nationwide, a new set of performance indicators and metrics is necessitated to measure progress towards these new management goals.⁴ Recommendations for community-led local and regional economic development opportunities

The USDA has pioneered a new approach to supporting rural economic development in Southeast Alaska via the Southeast Alaska Sustainability Strategy and the creation of a OneUSDA team to implement this strategy. This OneUSDA approach is a recognition that the big agencies of the USDA - Natural Resources Conservation Service, Forest Service, and Rural Development - need to work together and have better communication pathways in order to identify the overlap between land management decisions and rural development opportunities on the ground. This OneUSDA approach was described by the USDA itself as the first time that a team with representatives from all three agencies has been established with regular meetings and expected communication. In Southeast Alaska, the OneUSDA team has been in regular and consistent communication with community development organizations, tribes, and other entities on the ground, leading to the creation of innovative public-private partnerships. Having a broad team of different agencies work together towards a common goal expands the pathways, ideas, and information on programs that are relevant to communities.

The focus of E.O. 14072 on community-led local and regional economic development opportunities recognizes the importance of helping communities - especially rural communities - that live in close proximity to old growth forests develop holistic, diversified economies that go beyond unsustainable, boom and bust resource extraction that has characterized these areas for decades. Crafting these holistic, community-led economic approaches requires incorporating all the stakeholders, Tribal nations, state and municipal governments, community-based organizations, and others to develop a strategy that looks at everything from sustainable harvest of other forest products to broadband and renewable energy development. The Southeast Alaska Sustainability Strategy is the first time that the USDA looked at what was happening on the ground in the community and asked 'how can we support these grassroots efforts that are already happening?' This approach has lessons to offer other landscape level community-driven conservation and sustainable development efforts, as communities often know best what they already need. Partnerships and collaboration amongst a broad range of entities on the ground is critical to success.

Another critical component of supporting community-led local and regional economic development opportunities is

building local capacity and investing in workforce development. Industry transitions and economic diversification should be supported by federal investment in alternative economic development sectors. To this end, the USDA/DOI should implement vocational-technical and workforce development training programs in rural areas in coordination with local high schools and regional universities. Agencies should also work with local collaborative partnerships to align trainings with current forest management needs to provide a transferable skillset - e.g., to address forest management, visitor industry needs, tribal cultural and heritage resources, infrastructure maintenance and construction, computer technology, and administrative management, among others. One critical component is incorporating "soft skills" training to help local people develop critical life skills like mentoring and resume-building, self confidence, interpersonal and communication skills. When possible, local tribal crews should be trained and contracted to perform resource management and restoration work on lands around impacted communities. Furthermore, workforce development should not be considered when people are ready to enter the job market, but rather when youth are entering school; how is the USDA supporting partnerships that seek to engage youth and get them involved with the kinds of opportunities that will be available as jobs when they get older? Cultivating an ethic of curiosity and respect for the natural world and stimulating interest in conservation and sustainability values needs to start at an extremely young age. The USDA can support this by bolstering programs like 4H and cooperative extension units, and making sure that these programs are responsive to the needs of the communities that they serve. Not every rural community next to protected areas needs to learn about farming techniques; some may be better served learning about stream restoration or solar power. All can benefit from a focus on civic engagement and serving your community. Communities are able to see the benefits when local people are integrated in the stewardship, monitoring, and management of our natural resources. These investments in the youth will pay dividends well into the future, creating the next generation of community-minded leaders and combating the brain-drain and urban/rural divide that is ever increasing. In conclusion, this effort to conserve the nation's remaining old growth and mature forests and support the sustainable development of the communities located in and around these forests is crucial for our nation's ability to fight climate change. The Tongass National forest is a crucial component of this strategy, in that it is a nationally and globally unique temperate rainforest forest with large, intact stands of old growth that sequester more carbon than any other national forest. It is also the only remaining national forest in the U.S. that still clearcuts old growth, and the threat of logging needs to be addressed through policies like reforming the key performance indicators that rule budgets and agency staff time. A carbon sequestration metric should be introduced to help the United States inventory and account for the carbon sequestration that is supported by the Tongass. Conservation and careful management of forest resources goes hand in hand with sustainable community development. Support for innovative strategies and collaborations like the Southeast Alaska Sustainability Strategy and the OneUSDA should be uplifted and studied as to how they can apply to other rural areas to support community economic development efforts across the country. Critical component for success in these strategies is partnerships, collaboration, broad stakeholder engagement and buy in, and coordination and collaboration with tribal entities. Community economic development in rural areas next to public lands and intact stands of old growth and mature forests must incorporate and prioritize building local capacity and investing in diversified workforce development that helps workers who are currently employed in the logging industry transfer their skills to restoration efforts. Furthermore, workforce development must start early, and the USDA/DOI should incorporate investing in the youth and their ability to stay in place and support their communities into the future. In order for to support a healthy community or regional economic development strategy, the federal government needs to make investments that reflect the true diversity of economic opportunities and needs across the region - rather than piling most support and subsidies on one industry or another. We are grateful that the Biden administration is undertaking this effort to conserve old growth forests and sustainably develop the communities that depend on them. Please let us know how we can help achieve this goal. Sincerely, Katie Riley Deputy Director, Sitka Conservation Society katie@sitkawild.org 907-209-2019

FOOTNOTES: 1
https://tongasslandmgmt.org/wp-content/uploads/sites/6/2020/05/Alaska-Roadless-Rule-Citizen-Advisory-Committee-Final-Report_11.21.2018-1.pdf 2 <https://www.ktoo.org/2021/04/01/tongass-holds-more-than-40-of-all-carbon-stored-by-national-forests/>

ATTACHMENT: [Alaska-Roadless-Rule-Citizen-Advisory-Committee-Final-Report_11.21.2018-1.pdf](#)