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Sidney R. Yates Federal Building

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Re: Comments Regarding Land Management Plan Direction for Old-Growth Forests Across the National Forest System #65356

Thank you for the opportunity to provide comments on the National Old Growth Amendment. Our comments address the ways that this rulemaking impacts management of the Tongass National Forest.

SalmonState, a seven-year-old initiative, 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.

We support the Forest Service managing old growth with a climate change response framework.

In Southeast Alaska, old growth forests play an important role in sequestering carbon and supporting the wild salmon and deer that support our way of life, as well as supporting commercial tourism and fisheries.

The Southeast Alaska Sustainability Strategy is a durable path forward for the agency. With this strategy the Forest Service has recognized that the days of large-scale clear cutting on the Tongass are over. The agency needs to successfully pivot to managing tourism, recreation, restoration and climate resilience. Ending large-scale old-growth harvests and reinstating the Roadless Rule for the Tongass have been important steps to protect our remaining old-growth habitats, including habitat for important wild foods, retain the carbon sequestration capabilities of the Forest, and support sustainable economic development as habitat for salmon caught in commercial fisheries and for the region's tourism sector.

The Tongass presents outstanding opportunities for carbon storage and sequestration as wildfire is not currently an issue in the Tongass. Federal lands with an active timber harvest program in Alaska (i.e., the Tongass National Forest) have the highest carbon densities (360 MgCO₂e ha⁻¹, inclusive of harvested areas) in the state with the most abundant remaining old-growth forest with associated ecosystem co-benefits (Shanley et al. 2024, Albert & Schoen, 2013, Law, B. E. et al. 2023). While our second growth forests can benefit from restoration, the Forest Service should allow natural function in old-growth forests to support climate resilience. Natural carbon solutions are critical for mitigating climate change in the near term, and although they are not a substitute for decarbonizing the economy, they offer a meaningful opportunity to achieve carbon emission reductions now (Shanley et al. 2024).

Cutting old growth in Southeast Alaska does not have a proactive stewardship purpose.

We recognize that local mills can harvest small volumes of old growth for local, value-added purposes. However, removing old-growth forest will not move the landscape towards a condition where old-growth forests are "resilient and adaptable to stressors and likely future environments." There are conditions where it is acceptable to harvest some old growth trees with minimal ecological impact and allow for cultural and economic uses.

* For cultural uses as defined by tribes. SalmonState recognizes the important role of harvesting trees for indigenous cultural purposes. This has been a use of the land for thousands of years and should continue.

* Allowing small local sales of commercial old growth for local markets at very small scales may be an appropriate balance to strike between social, economic, and ecological objectives, but it is not advancing ecological objectives.

* Future silvicultural prescriptions should be more tailored to reducing habitat degradation.

* Past forest management in Southeast Alaska has significantly reduced old growth habitat in specific contiguous island habitats. The DEIS states that continued commercial and cultural harvest "...has been expected to be a very small portion of the old growth in the Tongass...." While the overall percentage of old-growth forest on the forest overall is relatively natural, important productive habitats within our isolated island biogeography have been severely reduced in concentrated areas. When calculating the impacts of logging old growth in the Tongass, the Forest should take an island biogeographic approach that looks at impacts to each island landscape.

The National Old Growth Amendment can provide additional clarity about intentions for the Tongass.

* Define framework for how small commercial old-growth logging is allowed in the Tongass. The rule can clarify a direction for how the agency intends to allow commercial old growth logging on the Tongass within the framework of responding to climate change.

o Use a climate framework for managing old growth forests.

o FEIS should clarify that cutting old growth is not proactive stewardship in the Tongass. Standard 2a (NOGA-FW-STD-02a) and Standard 3 (NOGA-FW-STD-03) states that the purpose of management in old growth cannot be for timber production, though commercial timber harvest may be used to achieve stewardship goals. However, there are no circumstances on the Tongass where old growth harvests could be described as proactive stewardship as defined in the rule. Cutting down old growth trees will not advance any of the benefits that these types of forests provide nor will it enhance their resilience. Removing old trees would not promote the quality, composition, stature, pattern, or ecological processes necessary for old growth to be resilient and adaptable.

o FEIS should provide a limited framework under which commercial old growth logging may be allowed under the current plan.

? Define appropriate silvicultural prescriptions and ecological conditions that will be maintained in commercial old-growth stands. This framework should not allow large-scale clearcuts, round log export, and should maintain existing Roadless Rule protections. Silvicultural prescriptions should be limited to single tree, group, or small patch cuts, and the landscape should still retain ecological old growth function and description after harvest.

? Old growth harvest should be allowed for local community purposes. These purposes include indigenous cultural uses, local construction, commercial art products, value-added products, and wood for music instruments. This definition can provide clarity about specific local demands for wood as opposed to vast global commodity markets. The Forest Service should work with the communities, tribes, and small mills to identify where is suitable for old growth cuts based on a balancing of factors, including community priorities for subsistence harvesting habitat which should be avoided.

? NOGA-FW-STD-02c.iii The Forest Service should describe how this exemption applies to the Tongass, if at all.

? NOGA-FW-STD-02c.iv Define "de minimis local uses."

* Clarify the contradictions and exemptions in the DEIS to reduce confusion and close potential loopholes.

o Clarify intent regarding old-growth harvest for commercial purposes.

o Clarify potentially confusing wording in plan document: DEIS Page 106: Presumes that most commercial sales are not allowed but says OG sales may be allowed as stewardship. However, we emphasize that harvesting old growth in the Tongass is not proactive stewardship. Appendix B pg. 36 ALT 2 effects assumed to be the same as no action, and the explanations of ALT 2 Standards and Guides explains that the Tongass will be able to provide commitments for commercial old growth as stewardship or with exemptions. We encourage the Forest Service to clarify their intent to allow small-scale old-growth harvests for local uses.

* This rule can support and advance the policy direction of the Southeast Alaska Sustainability Strategy. We encourage the Forest Service to cement the direction of the Sustainability Strategy in the new Tongass Forest Plan. This amendment can provide a good starting point and guidance for the agency to manage the Tongass for climate resilience and support a 21st century Alaska. The Forest Service must successfully pivot to focus on the key issues facing Southeast Alaska: Managing tourism and recreation, restoring habitat, and supporting climate resilience.

- o Describe a small sales program on the Tongass in alignment with Sustainability Strategy direction.

- o Strengthen climate resilience framework.

Albert, D. M. & Schoen, J. W. Use of historical logging patterns to identify disproportionately logged ecosystems within temperate rainforests of southeastern Alaska. *Conserv. Biol.* 27, 774-784.
<https://onlinelibrary.wiley.com/doi/abs/10.1111/cobi.12109> (2013).

Law, B. E. et al. Southern Alaska's forest landscape integrity, habitat, and carbon are critical for meeting climate and conservation goals. *AGU Adv.* 4, e2023AV000965 (2023.)

Shanley, C.S., Graves, R.A., Drever, C.R. et al. Mapping forest-based natural climate solutions. *Commun Earth Environ* 5, 502 (2024). <https://doi.org/10.1038/s43247-024-01678-z>

ATTACHMENT: Old growth amendment comments .docx - - this is the same content that is coded in text box, it was also included as an attachment