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Dear Supervisor Sherman:

Thanks for the opportunity to comment on the draft Assessment reports supporting the revision of the Tongass National Forest land and resource management plan.

Overall, the assessments primarily focused on descriptions of resource conditions and did not provide enough background on how the resource conditions came to be, what the previous forest plans might have had to do with current resource conditions and whether the resource conditions were desirable or not. This makes these assessments difficult to use in their current state to identify or justify Needs for Change.

Luckily there is still time to provide more of this discussion in the final Assessments, but I must admit I am disappointed that the public were not able to provide more locally meaningful responses to what would in my book qualify as actual assessments. There is, in my opinion, so much missing from these assessments in their current state that it is fairly difficult to provide a comprehensive review. I know that other organizations were able to hire planning rule experts to do just that so I will stick to some basic bullets that I hope are helpful to the planning staff as they work on the second draft of these assessments. I drafted these bullets in a format that points out what I think are obvious Needs or Change and I would recommend that the authors of the assessments consider how they would build the case for these Needs for Change in the appropriate assessments.

Community and Tongass Interdependence - The Tongass needs to formally recognize that our region's rural communities, especially tribal rural communities, are particularly dependent on Tongass lands that surround their communities, and as such, forest management should maximize local benefits of stewardship to the traditional, customary and modern economic and social values of the rural communities in the region. This recognized need for change might lead to a special management unit area, for example (see attachment).

Roaded Landscapes - The old management paradigm led to a "sacrificial watershed" type of approach where conservation values were concentrated in roadless watersheds and roaded watersheds were mostly sacrificed to the timber industry. Assessments should acknowledge that this is no longer socially acceptable and that roaded watersheds need to meet multiple community needs sustainably, not just in a boom and bust cycle.

POG Problem - Productive old-growth, or POG, is too general a classification for meaningful analysis of both the effectiveness of conservation lands and suitability for timber projects. Forest mapping for this plan should incorporate more detailed ecological attributes such as soil wetness, landform and anadromy as well as economic attributes such as accessibility, operability and tree species composition.

Ecological Integrity of Young Growth - The notion that the ecological integrity of young growth is improving if it has been pre-commercially thinned is simply wrong. On productive sites, young growth will require at least one second entry thinning to improve ecological conditions for more than 15 years or it will reenter a very low biodiversity state for at least 50+ years. The Tongass needs to change their approach to young growth to include second entry thinnings for purely wildlife and for commercial values.

Watershed Scale - Ecological integrity, habitat productivity, etc. should be maintained at the watershed scale in every watershed on the Tongass. Somewhere the assessments should acknowledge that planning at broader scales has allowed for concentrated impacts in some watersheds because impacts have been assessed over larger than watershed scales. We need S&Gs that are designed to maintain steady timber, deer and salmon production over time in every watershed on the Tongass.

Roadless Areas - Consider stronger protections for smaller and isolated roadless areas and allow for some development in large roadless areas under ecological forestry guidelines and with an emphasis on providing access to old-growth forest for traditional and customary uses, subsistence, recreation and tourism - all on at least equal footing with timber sales.

Management Unit Areas - I have attached a draft example of what a new management unit area map for the Tongass might look like, focusing just on the Petersburg Ranger District at this point.{{See Attached PRD MUA JPG map}}

Once again, thanks for the opportunity to comment.

Bob Christensen