

Data Submitted (UTC 11): 2/25/2025 6:03:30 AM

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February 24, 2025

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

#### Comments on draft Assessments

##### Topline comments

? The draft highlights important subjects, including recreation that should be carried forward as a core part of the Need to Change and the new Forest Plan.

? The Forest Service should celebrate successes and make a stronger connection between the Tongass and the recreation uses and economy that it supports across all chapters.

? Tourism and Recreation should be addressed as two stand alone sections within the chapter that reference and support each other. The Assessment should discuss the different needs and character of outdoor recreation and tourism.

? Make additions to the Assessment and "Key Takeaways" that take a critical look at the implementation of the current plan, and the outcomes of FS management to inform a good "Need to Change."

The Draft Assessments take important steps highlighting many important subject areas for Southeast Alaskans. The Tongass Recreation Partnership is excited to see the Forest Service put a greater focus on managing recreation and tourism, and we hope to see this focus continue through the process.

The Draft Assessment of Recreation and Tourism identifies numerous areas that need to change in a revised plan, which we hope to see carried forward. In order to make the right changes in the new plan, we need a clear understanding of how the Forest Service has implemented the current plan, and what the outcomes of that management has been. We have made recommendations for edits and additions to the key takeaways that will help us focus on a strong "Need to Change" document.

The Final Assessments need to include key takeaways that that:

? Assess differences in recreation use and commercial tourism activity across the different communities and different geography of the Forest.

? Use metrics that capture the ways the Forest supports recreation and tourism, and how

the character and needs of recreation and tourism are different.

? Meaningfully assess the work of the Forest Service implementing the current plan and responding to changing conditions in outdoor recreation. An assessment of Forest Service management should consider how well has the Forest Service been funding, managing, and maintaining its current recreation facilities; how it has met Forest Service standards and user expectations. It should assess the current condition of the infrastructure, staffing levels, and deferred maintenance; and discuss the forecasted outlook for these facilities related to funding, operation and maintenance. The Assessment should contemplate examples of strategies that have worked well as well as barriers.

Currently, the draft Assessments provide an inventory more than an assessment. Although the draft Assessment reports contain myriad information, most reports do not meet the expectations for Assessments set forth in the 2012 Planning Rule. Assessments evaluate conditions and trends, and their relationship to the existing land management plan, in the context of a broader landscape. 36 C.F.R. § 219.5(a)(1).

Below we recommend edits and additions to the key takeaways. We also articulate areas we like, areas that need additional highlighting, and areas that the draft misses the mark. We then offer suggestions for what needs to change in the new plan.

Changes to Recreation and Tourism "Key Takeaways"

? "Outdoor recreation is critically important both for the Southeast Alaska economy and for the traditional way of life for people of the Tongass."

? Add: The current plan does not provide sufficient guidance or prioritization to guide effective management.

? Add: The Tongass is a world class remote wild place with outstanding recreation, fishing, hunting, trapping, and scenery, with opportunities for locals and tourism businesses. People in Southeast want to keep these

primitive recreation experiences and balance non commercial and tourism use.

? Add: The FS manages and operates highly developed recreation facilities (MGRA) and less developed recreation facilities in or near communities on the road system (Public use cabins and trails). These are different types of outdoor recreation that provide the highest support for the economy and the easiest access to public lands.

? Comments: Socioeconomic Assessment needs to reflect this takeaway.

? "Recreation on the Tongass is strongly influenced by the marine-mountain interface, challenging access to many areas, the remoteness and size of the forest, and the extent to which tourism is a major economic force in the region."

? Comment: describe the characteristics of the Forest that make it special to local outdoor recreation uses (opportunities to explore, hunting and fishing opportunities, scenery, low density of people, iconic wildlife, opportunities for self reliance), as well as the characteristics that make it a world-wide tourist destination (including scenery, glaciers, iconic wildlife, calm inside waters, proximity to PNW)

? Add: "There are differences in outdoor recreation in different communities. Different demands need different management approaches. Collaboration with local entities is essential."

? "Due to the remoteness and relatively undeveloped nature of much of the Tongass, recreational opportunities available on the forest skew toward the primitive side of the

Recreation Opportunity Spectrum."

? Comments: Add or replace with "The Tongass provides some of the most remote and primitive outdoor recreation opportunities in the National Forest System. The primitive experience of the Tongass is prized by users, and people want to be able to access primitive recreation settings from their communities as well as in remote locations.

? Add: "Outdoor recreation and tourism users directly engage with and benefit from resources on the Forest. Particularly draws are primitive recreation opportunities, wild salmon, viewing iconic wildlife, scenery and glaciers.

? "Developed recreational opportunities and recreation infrastructure are scattered across the forest and include 189 recreational cabins or shelters, campgrounds, and wildlife viewing sites. Access to the forest is provided by over 900 miles of trail, over 1600 miles of road, and a variety of docks, buoys, and other marine access facilities. Maintenance of this infrastructure is complicated by challenging access to some areas, a wet climate, and fluctuating budgets."

? Add: Add: Infrastructure and management have failed to keep pace with demand. Local recreation and tourism businesses rely on these trails. (Alaska Trails, Alaska Sustainable Trails Strategy).

? Add: Trails often cross ownership boundaries.

? Add: Describe trends in Forest Service staffing, budgets, and ability to maintain outdoor recreation experiences.

? Comments: Are these resources sufficient to meet demand? What condition are they in? What have been the changes to these opportunities? What is their distribution? Outdoor recreation users want to access the full spectrum of recreation opportunities, from developed trails to wilderness-quality experiences, from their community.

? "The Tongass receives approximately 2.3 million recreational visits each year. Popular activities include hiking, viewing natural features, visitor center activities, fishing, viewing wildlife, and hunting."

? Add: Outdoor recreation users do not typically perceive boundaries with National Forest land. The Forest Service should consider how recreation infrastructure interacts with other land, trail, road, and cabin resources.

? Add: Growing tourism has led to conflicts over access to public land and changing experiences. FS has pursued voluntary agreements to reduce conflict and in recognition of the lack of regulatory authority over the waters. These voluntary agreements have not been successful at resolving the conflicts.

? Comments: Distinguish recreation and tourism use from a management perspective. Assess how the Forest Service is balancing, or not, recreation and tourism uses.

! Is the Tongass adequately served with recreation and tourism management resources?

! How has the Forest Service adapted to the growth and diversification of tourism across the Forest?

! What is the level of user conflict? Has there been an assessment of the number of incidences of reported user conflict and whether that has increased with the growth in the number of visitors?

! Has tourism growth affected the FS's ability to provide permitting and other management services - is there a correlation to be drawn between

growth and resources needed or wait times/backlog?

! How many of these are local recreation uses versus commercial/cruise ship visitors versus independent visitors? How do the demands of these users differ? Does the FS have data on what each type of visitor (cruise ship vs. independent) is looking for as their recreation experience, duration and where each goes? Is FS meeting this need through permitting and infrastructure? Are there new recreation trends these groups are looking for (ie. more developed visitor centers, e-bikes, catered hut-to-hut, etc.)

? "Tourism and commercial recreation on the Tongass are a key component of the statewide and regional economies and are predicted to grow in future years. Forest Service outfitter and guide permitting processes have been identified by some members of the public as a barrier to further development of a local recreation and tourism-based economy."

? Add: "Outdoor recreation and tourism are the biggest private sector economic drivers in the region. The current plan does not give guidance for managing this growth."

? Add: "The Tongass manages the single biggest USFS attraction, the Mendenhall Glacier Recreation Area. It is in the planning stages for expansion."

? Add: "The Tongass Forest is the "Alaskan" landscape that is the foundation of the region's outdoor recreation and tourism economies. Regardless if they set foot on the Tongass, all visitors and resident recreation relies on the scenic setting, remote settings, natural beauty, wildlife, and wild fish from the Tongass."

? Comments: Ensure that Socioeconomic Assessment reflects this.

? "Outdoor recreation can contribute to the ecological, social, and economic sustainability of the Tongass; however, recreation can also adversely impact the natural environment and may not contribute to social or cultural sustainability in all contexts."

? Add: "Outdoor recreation and commercial tourism serve distinct different needs of the public. Sometimes they are complimentary or in conflict.

! Commercial tourism and recreation have different user groups with different needs. Tourism and recreation are linked for visitors but for locals, these are not linked.

! The current plan does not identify the need to designate areas for higher-intensity commercial tourism and lower-intensity public recreation.

! The plan should categorize recreation and tourism assets based on intensity of use and primary user types. It should evaluate not only sites available for commercial use and commercial use types, but those sites and times preserved for independent recreation.

! The plan should consider compatibility of uses (or lack thereof) in its assessment of how these uses interact with the Forest.

? Add: "The current plan does not contemplate or address the evolution of recreation activity and tourism industry (particularly the growth of the cruise ship industry and its traffic) and the advancement of recreation-based technology (e.g., e-bikes or more powerful snowmachines), which are changing the recreation opportunities and experiences."

? Add: "The Forest Service increasingly relies on partners to do the work, but

local organizations have found the agency challenging to partner with. Partners report that the agency has been a better partner in recent years, leading to more successes. FS staff turnover is a key barrier to developing relationships in communities and meeting management objectives."

? Comment: This takeaway should be modified to distinguish commercial tourism activities from local outdoor recreation.

? Comment: Consider outdoor recreation and tourism as two distinct sections of the Assessment.

? Comment: Assessment should answer: How much does the FS collect in special use commercial fees? Are these fees earmarked for the recreation facility that generates them? MGRA has this but what about other areas visited that require users to pay for commercial use? Are fees sufficient for the operation and maintenance of these assets? What recreation assets are underfunding despite collecting fees? What are success stories?

? Comment: Are these assets being adequately managed and maintained by FS staff to minimize impacts by recreation use? Which ones are and which ones are not. What are the challenges beyond money and staffing to minimize impacts? What strategies have been successful?

? "Climate change and the projected continued growth of the tourism industry in Southeast Alaska will affect recreational opportunities on the Tongass in the future."

? Comment: Consider decoupling climate change and tourism industry. They are very different factors that have different impacts on recreation. Need to list specific effects for each. Current plan does not provide guidance for either of these factors.

? "Prominent themes from public feedback received during recent forest planning efforts include:

? A desire for diverse recreation opportunities across the forest

? The importance of recreation infrastructure and the need for maintenance of existing infrastructure

? The need to minimize impacts from recreation on subsistence opportunities

? A desire for increased education on responsible recreation

? A desire for increased flexibility, clarity, and communication regarding permitted uses and permitting processes for outfitter and guide activity on the forest

? The need to preserve the natural environment and wilderness character of the forest.

? The need for balance between use, preservation, local recreational use of the forest, and forest-based tourism.

? Comments: We appreciate the Forest Service recognizing this important feedback.

? Add: Many believe that the Forest Service has not prioritized recreation or tourism management on the Tongass.

? Add: Describe trends: changes in participation, travel trends, and change in demands.

? Overall, outdoor rec is a \$3.1 billion industry in AK (Outdoor Industry Association, 2024 Outdoor Participation Trends Report).

? Alaska has the highest rate of participation in outdoor recreation, tied with Montana (OIA, 2024 Outdoor Participation Trends Report).

? There has been massive growth in tourism. Where are these people coming from, why are they coming here? From 1993 to 1997, prior to the current plan visitor numbers increased 60%. Numbers have grown from 500,000 in 1997 to

1.67 million in 2024. With 2.5 million visits estimated in this Assessment, outdoor

recreation and tourism management need to be a core focus of the new plan.

<https://www.arlis.org/docs/vol1/Q/41841099.pdf>

? Tourism has become the single biggest employer in the region at 8,263 jobs, and the highest wage earner.

<https://www.seconferece.org/wp-content/uploads/2024/10/Meilani-Schjvens-SEAK-By-the-Numbers.pdf>

What we like:

? Recognition of the importance of recreation and tourism to the region.

? Importance of recreation to locals and to the Alaskan way of life. Appreciate that thoughtful consideration of the intersections with traditional ways of life for Alaska Natives, rural subsistence. Distinguishing between recreation management and tourism management will inform a better plan.

? Recognition that management guidance is out of date.

? Recognition that all recreation and tourism to SE Alaska is related to the Tongass.

The draft Socioeconomic Assessment should give the Forest Service credit for supporting more tourism and recreation jobs (Socioeconomic 26). None of the tourism jobs would be possible without the draw of the Alaskan landscape.

? Recognition of the importance of the diversity of opportunity. Recognizing demand to balance non commercial and commercial opportunities, developed recreation and primitive, particularly on some of the most wild and remote lands in the National Forest System.

What needs to be highlighted

? Highlight the distinctive differences between local recreation and tourism. The experiences are different, though the activities may be similar. The agency needs a plan for recreation and tourism that recognizes how they support each other and also how they make distinct contributions to local communities.

? Highlight: Rigorous economic picture of the impacts of tourism and recreation for different communities. Recreation use, Jobs, tax benefits, investment trends differ across communities. Forest Service special use permitting has implications for where the benefits of the Tongass flow. A clear understanding of how these impacts differ across communities will help inform a good plan to guide the Forest Service to benefit these communities. Assessment could recognize international travel as an export benefit.

? Highlight: Successes and Opportunities in recreation. The agency has a lot to celebrate in this section, including partnerships with users groups, trail building groups, tribal partners, as well as being a globally-significant tourism destination. Opportunities to build new trails, ski trails, motorized trails. Opportunities to work with partners to enrich experience with Alaska Native cultural interpretation, build and maintain recreation infrastructure, monitor tourism activity.

What is missing

? Assessment of 1997 Forest Plan-Recreation Actions: Assessment of the success of the agency at meeting the goals/management direction for recreation and tourism in the previous plan: did we meet our objectives, did we achieve the desired conditions? Did the previous plan give good guidance? What was not accomplished, why, and was that a critical miss? Challenges to overcome (Lessons-Learned) that might impact this new plan?

? Assessment of FS Staffing and Funding: Has the FS met its objectives for staffing,

management and maintenance of existing recreation facilities while meeting user expectations? Is the FS adequately staffed and managing the development of new recreation projects (GAOA and others)?

? Assessment of the variation across the region: Assessment of how communities interact with each other and the Forest, how communities and conditions vary across the region.

? Assessment of how ecosystem services support key economic sectors: Make a direct connection between the Nation Forest's ecology and ecosystem services and tourism industry, particularly in the Draft Socioeconomic Assessment. The Socioeconomic section vastly undercounts the role of the Forest supporting the tourism economy. The draft Aquatic Ecosystems and Socioeconomic chapters needs to address the role of salmon as a key resource in both commercial fisheries and sport fishing. The SE Conference SWOT Analysis in the new CEDS lists natural beauty (FS lands) and seafood (wild salmon from the Tongass National Forest) as some of the top strengths of the regional economy, along with Indigenous culture.

? Assessment of how conditions have changed over time: this document describes conditions today, but should describe what conditions were like when the 1997 plan was implemented, and if Forest Service actions are related to these changes. Assess the sufficiency and condition of existing infrastructure. What are the trends and opportunities for recreation on the Tongass?

Vision for Recreation and Tourism Management

Need to change

? Prioritization of outdoor recreation. Prioritize trail building and other recreation facilities and maintaining recreation infrastructure. Replace 2010 Leaders Intent Document with a statement prioritizing recreation. The new plan needs to contemplate and prioritize the growth of demand for outdoor recreation and guided experiences.

? Contemplate the distinct differences between commercial and non commercial recreation.

? Contemplate or address the evolution of recreation activity and the tourism industry (particularly the growth of the cruise ship industry and its traffic) and the advancement of recreation-based technology (e.g., new recreation equipment),

which are changing the recreation experience. New plan should ensure the continuation of the Alaskan experience that is important to locals.

? Need a Forest-wide plan to respond to recreation and tourism demand, infrastructure demand. Contemplate how to meet the demand and preserve places for local use, how to use meaningful limits in space and time. Protect the culture of communities by ensuring that there are places left for locals.

? Plan components should direct the Forest Service to develop projects from local input, collaboration. Develop projects collaboratively with partners across jurisdictions and with shared priorities. Reduce partnership barriers.

? Set objectives and clear metrics that capture the value that the Forest provides to the region's recreation users and tourism businesses.

? Monitoring and adaptability are required activities.

? Prioritize staffing and funding of recreation at the District level from new project development to caring for existing facilities. Make recreation a priority at the Districts, they are the critical link and support the local small town economies with good paying jobs.

The draft Assessment acknowledges the following areas in the current plan that need to change. We agree with these and they should be addressed in the Need for Change.

- ? There is a need for more interpretive information and infrastructure (including signage and information in Native languages);
- ? There is a need for more recreational trail access overall;
- ? Need to address if access to some areas has resulted in the destruction and theft of cultural resources important to Tribes;
- ? There is a need to address climate change and how it is affecting all resources on the Forest;
- ? There is a need to address the changing seasonal and duration recreational use of the Forest and its surrounding waters;
- ? Increasing recreational use is leading to user conflicts, including conflicts between Indigenous populations and the general public, and voluntary segmentation of uses does not appear to be addressing the issue;
- ? Need to update and identify areas that should have a local use preference (but open to all), those that can accommodate higher use (carrying capacities while minimizing impacts), types of allowable uses, and areas that should be preserved due to sensitivity of land and resources.
- ? There is a need to streamline the outfitter and guide permit process;
- ? There is a need to increase local benefits from tourism operations;
- ? There are conflicting user expectations regarding access to recreational and tourist opportunities,

Thank you for considering these comments. They were developed with the input of the Tongass Recreation Partnership members and steering committee, and reflect a great enthusiasm to see the Forest Service engaging on these subjects in this Assessment. We look forward to working with you as you continue this process.