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Comments: I reviewed the draft Land Management Plan. My overall comment is that the US government is entering an era of accountability, measured and reported performance, and common sense. This Tongass National Forest Management Plan Revision #64039 does not appear to me to be up to that standard.

I submit comments as a long-time professional forester and a Certified Forester. My comments, in no particular order, are that even the very much reduced allowable cut is not being reached, and I saw nothing in the draft plan showing a realistic plan and solid time estimate for reaching the allowable cut. As a matter of fact the plan is almost devoid of goals, timelines, and the like. Once the plan is finalized how do taxpayers, let alone professional foresters tell if you are succeeding or falling short?

No doubt one reason you are not reaching the allowable cut is that there is no apparent strategy to assure potential forest industry players and investors that the Tongass NF intends to offer a reliable flow of timber for primary manufacture. Is that concept recognized by the agency?

The Tongass NF harvest I have seen in recent decades amounts to high-grading, taking the best timber and leaving the utility grades to rot. That is exactly what the USFS intended to avoid with the two 50-year timber sale contracts which ended abruptly in the 1990's. The silviculture textbooks that I have all treat high-grading as unprofessional and wasteful, especially on publicly-owned land. I have found that to be all the more the case when the high-grading is of merchantable species usually prescribed for even-aged management such as Sitka spruce and western hemlock.

I find your treatment of Alaska Native interests to be vitiating. Alaska Natives in coastal Alaska obtained and harvested many hundreds of millions of board feet, sold that timber almost exclusively into the round-log export market, and made many people of 1/4 or greater Alaska Native blood into millionaires. They then were able to sell Congressionally designated and authorized net operating losses for \$1 billion or more. More recently they have sold carbon credits for remaining timber that was less merchantable. (None of the timber harvests were done on a sustained yield basis by the way, and for the most part the village corporations have exhausted their timber entirely.) So limiting your treatment of Native interests to what we might more often see come from Hollywood in films like "Dances with Wolves," and "Little Big Man" is silly and worse in my view.

Upon abandonment of the forest products industry the USFS spent millions of dollars developing a "young growth" timber industry on the Tongass NF, and nothing has come of it. In 2011, a group of six Alaska professional foresters, among them a former USFS R10 Regional Forester, a forester who had run the continuous forest inventory system, a chief forester for the Native regional corporation, a former Alaska State Forester, and others amounting to combined Alaska professional forester experience of more than 100 years presented a paper at the annual Society of American Foresters convention in which they explained why the very expensive Tongass NF second growth plans and strategies were doomed to fail right from the beginning. I am disappointed in you for continuing to write as if this plan has not failed. The paper explained here is part of the published and peer-reviewed record of the convention presentations.

As the USFS is a forestry organization, the largest one in the world, I am also disappointed that every heading and subheading of this draft plan is not led by and signed by a named professional forester. Please consider having a professional forester put his/her name on every section of this plan as is usually done and should be done on every silvicultural prescription and every timber harvest plan. A metric I would recommend to you in the preparation of any forest plan is that of learning and reporting how many of the people working on the plan know the line logging whistle code: That is one easily determined and (in my experience) reliable indicator of plan

reliability, and it's not too much to ask of the USFS.

That concludes my comment.