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First name: David

Last name: Katz

Organization:

Title:

Comments: I would like to offer the following comments:

Assessment: Species of Conservation Concern

Page 10, par. 2: "These activities have led to habitat fragmentation across portions of the roughly 4% of the Tongass where logging has occurred."

This appears to be the assessment's only mention of habitat fragmentation resulting from logging and road building. There is no explanation of the threat that this kind of habitat fragmentation poses to species requiring large areas of intact old-growth forest for survival. This principle is fundamental to Tongass species conservation and should be explained. The observation that habitat fragmentation is present "across portions of the roughly 4% of the Tongass where logging has occurred" is misleading in that the great majority of that habitat fragmentation is concentrated in the area on the Tongass where the great majority of logging has historically taken place - on northern and central Prince of Wales Island.

Further, judging from the Timber resource assessment, the "4% of the Tongass where logging has occurred" appears actually to be 4% of the forested area (not the whole Tongass land area) and really 8% of the "productive forest land," perhaps half of which is actually thinly stocked forest often on wet soils. The habitat fragmentation of greatest importance to species survival on the Tongass is the areas containing the stands of larger trees that were logged over decades, concentrated on POW. The assessment should make that clear.

Moreover, the assessments should all be consistent in what they mean by some percentage of the "Tongass." Is it the 16.9 million acres, all "forested" areas, all "productive forest," or the contiguous areas of large trees that were logged? Finally, extensive logging on Native Corporation lands (and other ownerships) should be part of the consideration of old growth habitat fragmentation.

Habitat fragmentation may be especially important with regard to the Queen Charlotte goshawk, and it is appropriate that the assessment classifies it as needing further evaluation.

A reference I expected to see but do not is: Iverson, et al. 1996. Conservation assessment for the northern goshawk in southeast Alaska. Gen. Tech. Rep. PNW-GTR-387. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 101 p. (Conservation and resource assessments for the [1997] Tongass land management plan revision). This earlier, extensive assessment should play a role in the current assessment.

Assessment: Carbon Stocks

Page 10: "However, FIA plots are not located within Wilderness Areas on the Tongass National Forest (approximately 3 million acres of forested area are within wilderness on the Tongass), so these estimates do not capture the carbon stored in soils, live, and dead carbon pools in these locations (Figure 2) and as such, underestimates [sic] the total amount of stored carbon on the Forest."

More should be done to somehow include these omitted acres in the assessment. Many of these wilderness acres contain highly productive forest, which should add substantially to the amount of carbon stored by the Tongass, and raise even higher the percentage of carbon stored by the Tongass relative to that of all National Forests, and all forests both in and outside of the National Forest system. To not include these acres, even by

some technically defensible estimate, diminishes the very real importance of the Tongass as a carbon sink.

#### Page 11: Carbon in Harvested Wood Products

The analysis is highly speculative and as it is should not be a basis for timber planning. Burning wood products releases additional carbon into the atmosphere. The idea presented here that it would lessen carbon emissions because it might substitute for fossil fuels is speculative because it might just as likely substitute for clean energy sources such as solar, wind or hydro power. The analysis should be much sharper.

It is not at all clear what the basis is for the estimates of landfill carbon storage. The product produced on the Tongass for decades was primarily dissolving pulp, used in a variety of products from food to diapers. How does one estimate a landfill storage for products such as these, which are not solid wood products? There is no evidence that some portion of Tongass logs wound up in a landfill.

#### Pages 12-13: Carbon stock dynamics

The analysis is for the time period from 1990 through 2011. It is not clear why this period is especially relevant. The two Tongass pulp mills closed in 1993 and 1997. A more revealing analysis would be from 1954, when industrial-scale logging began, through the present. This would reveal the relationship between the main disturbance of logging levels and carbon flux. The current analysis concludes that with the relatively low logging level of recent years, carbon storage is not materially lessened. But the equally important question is what would happen if logging levels were to substantially increase. How much carbon storage would be lost in that case? This would be revealed by following Tongass logging levels from 1954, or even 1907, through the present.

"Harvest affected about 0.9 percent (approximately 24,872 ha) of total area included in the model analysis (2,749,499 ha) over this period. On average, harvest affected 0.04 percent of the total forested area per year (Figure 5).":

This analysis seems to state that logging has had a negligible effect on the Tongass, and on carbon storage. The analysis treats all acres of "forested area" as the same. But "forested area" as a term of art is different from "productive forest" and from "highly productive forest," all of which would be within the "forested area." But "productive forest," signifying a higher presence of actual trees than merely "forested area," and "highly productive forest," signifying the stands of larger trees that store the most carbon, and which occupy a smaller subset of acres, are not all the same. And historically, logging has concentrated in these stands of larger trees. It seems relevant to explain this difference and note that carbon storage levels are affected most by logging in the highly productive stands, and that historically there has been a much higher level of disturbance in those stands.

Thank you.