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First name: Theogene

Last name: Mbabaliye

Organization: US Environmental Protection Agency, Region 10

Title: NEPA Branch - Mining Sector Lead

Comments: Hi Marion!

The EPA conducted limited review of the Draft Assessments for Tongass NF Plan Revision and has the following input:

* EPA supports the priority of Tribal co-governance, -management, and -stewardship; ensuring Tribes have a meaningful decision-making role regarding the ability of tribal citizens to practice their traditions and make decisions on projects in and near their traditional territories[1]. We encourage more thought and details regarding the governance structure and implementation of a decision-making process that both ensures Tribal participation (and support thereof) and that Tribal contributions carry weight and drive decision-making.

* EPA agrees that stream and river ecosystems on the Tongass are some of the world's most valuable freshwater ecosystems to salmon and other aquatic species[2]. Riparian forests are critical in maintaining high functioning stream and river systems by protecting water quality and providing large wood instream and on floodplains to provide critical components of aquatic ecosystems services. The current Forest Plan requires watershed analysis before making site-specific adjustments to riparian standards and guidelines and authorizing management activities in public water system source watersheds. Given the importance of riparian forests to aquatic systems, the Forest Service should describe in detail any proposed changes to riparian standards and guidelines and how the Forest Service will limit harvesting in riparian areas to protect aquatic resources and monitor impacts from any riparian timber harvests to ensure aquatic resources are protected.

* While road densities are relatively low on the Tongass and watershed conditions are relatively good, some sub-watersheds are bordering on functioning at risk. Most sub-watersheds with decreased function have rated "road and trail condition indicators" (Watershed Condition Framework) as fair or poor[3]. The Forest Service should explain how roads and trails are impacting subwatershed function and ensure any proposed road expansion does not result in decreased watershed function.

* Tribes express concern about old growth logging and second-growth timber harvest that mirrors the clearcut and export model¹. The Draft Timber Resources Assessment[4] shows Tongass National Forest timber harvest by species in Table 4 (e.g., 18,052 total MBF in 2023); shows Number of timber sales and timber sold volume for old growth and young growth in Table 5 (e.g., 1,759 MBF old growth + 671 MBF young growth in 2023); and shows Volume of log export permits by destination in Figure 6 (e.g., roughly 17,000 MBF exported to Pacific Rim in 2023). The information could be better presented to inform the public. In comparing the 2023 data listed above, it appears most of timber harvest by species (18,052 MBF total) is being exported to the Pacific Rim (~17,000MBF). But it's not clear how much of it is old growth versus young growth since the total MBF for 2023 in Table 5 (2,430 MBF) is well below the total harvested by species and exported. The Forest Service should better articulate the percentages of both old growth and young growth timber being harvested and exported to the Pacific Rim, and how it is addressing the Tribes concerns regarding exports.

* For air quality assessment, adding monitored background air concentrations data in the vicinity, if available, will be useful in showing baseline air quality. If no representative dataset is available, we will understand the assessment approach. The EPA is pleased to see marine traffic short-term impacts from plumes is a focus of the air quality assessment.

* Concerning water quality impacts from management changes, it would be good to have in the future an analysis of these impacts to figure out changes within the riparian area resulting from various alternatives.

[1] The Tongass as an Indigenous Place Draft Assessment

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1221271.pdf

2 Draft Aquatic Ecosystems Resource Assessment Tongass National Forest Plan Revision

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1220702.pdf

3 Draft Watershed Condition and Water Resource Assessment Tongass National Forest Plan Revision

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1219892.pdf

4 Draft Timber Resources Assessment https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1221270.pdf

Please let me know if you have questions about our input for assistance.

Thanks,

Theo Mbabaliye, Ph.D.