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ALASKA REGIONAL OFFICE | ANCHORAGE

310 K STREET, SUITE 508

ANCHORAGE, AK 99501

T: 907.277.2500

F: 907.277.1390

ALASKA REGIONAL OFFICE | JUNEAU

325 FOURTH ST.

JUNEAU, AK 99801

T: 907.586.2751

F: 907.277.1390

May 6, 2026

VIA CARA.FS2C.USDA.GOV

Erin Matthews, Environmental Coordinator
Tongass National Forest
USDA Forest Service
648 Mission Street, Suite 110
Federal Building
Ketchikan, AK 99901

Re: Tongass National Forest Land Management Plan Revision #64039,
Preliminary Draft Plan Content

Dear Ms. Matthews,

Earthjustice submits these comments regarding the preliminary draft plan content for the Tongass National Forest Land Management Plan Revision. While we appreciate the interest in simplifying the forest plan, it does not appear that the approach the Forest Service is proposing would meet the requirements of the National Forest Management Act (NFMA) and the 2012 Planning Rule. There are significant gaps in the preliminary draft plan content, including species-specific standards and guidelines, criteria for size and connectivity of old-growth reserves, restoration and stream channel standards, aquatic organism passage standards, and monitoring requirements. The preliminary draft plan content appears less protective than the current plan and it is not clear how the preliminary draft content would achieve the goals of the habitat conservation strategy without any standards to ensure that the system of old-growth reserves is maintained. In addition, the rushed process the Forest Service is following makes it difficult for the public to engage meaningfully. It is challenging to compare the effects of the preliminary draft plan content with the current plan based on the information provided, and it is not clear how the Forest Service could have taken public comment into account in developing the plan content when the content was released before the conclusion of the public comment period for the notice of intent. We ask the Forest Service to slow down the process so that it can take public comment from one stage of the process into account before it proceeds to the next phase. If the Forest Service pursues the approach envisioned in the preliminary draft plan content, it is not likely to meet its legal obligations.

The need for change should set out a vision for a plan focused on prioritizing subsistence and Indigenous rights, supporting a healthy ecosystem with abundant salmon and wildlife, and meeting the challenges of climate change by protecting the Tongass' globally important carbon reserves.

As we argued in our comments on the notice of intent, the need for change appropriately recognizes the importance of subsistence considerations, Indigenous knowledge, and key regional economic drivers like tourism and recreation, but it ignores the need to support fisheries and wildlife needs, address climate change, and repair the harm caused by past logging.¹ The new forest plan should center these critical needs, not an outdated vision of a timber-centered economy that is no longer a significant contributor to the regional economy. The plan should include forest-wide direction to address each of these needs, including desired conditions, goals, and standards and guidelines focused on protecting carbon-rich old-growth stands from logging, improving riparian buffers and repairing blocked culverts to enhance fish passage, and setting stronger standards for wildlife protection and old-growth connectivity. A key component of the new plan should be completing the young-growth transition by immediately ending old-growth logging (not waiting until 2032, as proposed in the preliminary draft plan content). The plan should also set clear standards for young-growth logging to ensure that logging proceeds in an ecologically sustainable way by protecting sensitive areas (including karst, and riparian, beach, and estuary fringe) from logging, allowing trees to grow into old-growth conditions where connectivity standards and wildlife habitat needs are not currently being met, and protecting or enhancing areas important for subsistence and recreational uses.²

The preliminary draft plan does not meet the requirements of NFMA and the 2012 Planning Rule.

The preliminary draft plan content fails to address important resources, resulting in a less protective plan that does not comply with NFMA and the 2012 Planning Rule. If the Forest Service intends to adopt a simplified management areas approach instead of the current land use designations, it will, at a minimum, need to ensure that the forest-wide and management area content is expanded to include the following content:

- Monitoring requirements to enable the agency to determine whether the plan is working, as required under 36 C.F.R. § 219.12.
- Standards and guidelines to protect species of conservation concern and federally listed or candidate species, as required under 36 C.F.R. § 219.9(b). Although the Forest Service has published a list of proposed species of conservation concern, nothing in the preliminary draft plan addresses the

¹ See Alaska Wilderness League *et al.*, Letter to Erin Matthews, Environmental Coordinator, Tongass National Forest, Re: Tongass National Forest Land Management Plan Revision, Notice of Intent to Prepare an Environmental Impact Statement (Mar. 20, 2026) (“AWL comments”).

² See *id.* at 5-6.

needs of these species, perhaps because the Forest Service developed the preliminary draft plan content before it identified the species that need to be protected. By contrast, the current plan includes wildlife standards and guidelines for deer, wolves, bears, bald eagles, seabirds, marine mammals, waterfowl and shorebirds, herons and raptors, mountain goats, marbled murrelets, moose, American marten, endemic mammals, northern goshawks, peregrine falcons, trumpeter swans, ospreys, and Kittlitz's murrelets.³ It also has standards for wildlife habitat improvement and maintenance.⁴ As we have pointed out in previous comments, the Forest Service's own recent science and assessments for this plan revision identify failings in the current plan's wildlife standards,⁵ but, instead of addressing those inadequacies, the preliminary draft plan abandons them and includes no content to address any particular species. This is a significant issue that must be addressed in the alternatives that are carried forward into a draft environmental impact statement.

- Specific standards and guidelines to implement the old-growth habitat conservation strategy and address its shortcomings. Both NFMA and the 2012 Planning Rule require the Forest Service to maintain the diversity of plant and animal communities in the planning area, 16 U.S.C. § 1604(g)(3)(b); 36 C.F.R. § 219.9. The current forest plan uses the old-growth habitat conservation strategy to meet these diversity requirements. In the notice of intent to prepare an environmental impact statement for the forest plan revision, the Forest Service indicated that it does not intend to change the old-growth habitat conservation strategy,⁶ even though recent studies, including the Forest Service's own analysis for the plan revision, call into question whether the strategy is functioning as intended.⁷ The preliminary draft plan, however, does not appear to include any content incorporating the old-growth habitat conservation strategy or addressing its shortcomings. The current forest plan includes standards for the size of old-growth reserves and connectivity requirements, and a process for adjusting the boundaries of reserves.⁸ Any new plan must also incorporate specific standards for connectivity, size of reserves, and other requirements of the habitat conservation strategy. And, if the new plan does not address the shortcomings of the existing strategy, it will not be in compliance with NFMA's diversity requirement.
- Identification of watersheds that are a priority for maintenance and restoration, as required under 36 C.F.R. § 219.7(f). The preliminary draft plan does not identify any restoration priorities or adopt goals or standards for repairing blocked culverts or otherwise restoring watershed function.

³ See 2016 Tongass Land and Resource Management Plan at 4-85 to 4-97.

⁴ *Id.*

⁵ See, e.g., AWL comments at 7-8.

⁶ 91 Fed. Reg. 7424, 7427 (Feb. 18, 2026).

⁷ See, e.g., AWL comments at 7-8.

⁸ See, e.g., 2016 Tongass Land and Resource Management Plan at 4-86 (legacy forest structure), 4-87 (landscape connectivity), app. K (old-growth reserve modification standards).

- Components addressing climate change, as required under 36 C.F.R. § 219.8(a)(iv). Plan components should be developed to protect the Tongass' globally important carbon stocks and to address the effects of climate change in the forest. For example, although the preliminary draft plan mentions yellow cedar decline, it does not provide any standards to protect yellow cedar from this climate-driven problem. Nor does it address the changing habitat needs of species in a changing climate. A plan that meets today's challenges should address these and other emerging issues related to climate change.

Some of the preliminary draft plan content needs clarification or has important gaps.

Because the preliminary draft plan takes a different approach to management than the existing forest plan, it is difficult to understand the intent and effect of all of the proposed changes. A few examples follow:

- The description of forest types are different from current forest descriptions and it is not clear how these forest types overlap with how the different categories of forests are described in the current plan. In addition, the descriptions in the preliminary draft plan include specific desired conditions that set out desired percentages of canopy cover and tree age.⁹ It is not clear whether this is intended as a description of existing conditions or, since it is a "desired condition," is intended to suggest that the Forest Service may direct logging to achieve the described percent canopy cover. The plan should clarify that these are descriptions of naturally occurring conditions in unlogged forests of this type rather than a direction to create those conditions through commercial logging.
- The preliminary draft plan content related to cultural resources and sacred sites reflects the Forest Service's aspirations, in the need for change, to "consider" culturally significant sites and cultural issues.¹⁰ The current plan has more detailed standards than the preliminary draft plan regarding protection of sacred sites and coordinating forest management activities with Tribes, yet the Forest Service still has not met its obligations to inventory and identify sacred sites so that they can be better protected. How will this less detailed plan content ensure that the Forest Service meets those obligations?
- The desired conditions and goals for old-growth forests appropriately recognize the cultural and ecological importance of old-growth forests.¹¹ A desired condition should be added to state that old-growth forests should remain in a natural state and should not be logged, except for cultural wood for Alaska Native traditional uses. A goal should also be added to specify connectivity standards.

⁹ See, e.g., Preliminary Draft Plan Content at 32 (describing 60% canopy cover as a desired condition for well-drained forests).

¹⁰ See 91 Fed. Reg. at 7426 (need for change); Preliminary Draft Plan Content at 34 (cultural sites).

¹¹ Preliminary Draft Plan Content at 49-51.

- The preliminary draft plan content appropriately provides a desired condition for inventoried roadless areas of retaining roadless characteristics.¹² However, inventoried roadless areas should also be designated unsuitable for timber production, regardless of the status of the Roadless Area Conservation Rule.
- In the key fisheries watersheds management areas, timber production should not be permitted. All watersheds that support fisheries should be included in this category, not just a subset of them. One of the primary goals of the revised forest plan should be to support healthy salmon production because of its importance for subsistence, commercial, and sport fishing, and the plan should therefore include strong protection for all watersheds that support subsistence, commercial, or sport fisheries.
- The maps for community use areas show designated areas for only a few communities. If the goal of this management area is to improve inclusion of communities in forest planning for areas important to the communities, all communities should have designated community use areas.
- It is not clear whether the old growth management areas include all current old-growth reserves, what connectivity and size standards might apply, and whether any such standards would be designed to meet the needs of old-growth dependent species. Maps should be provided to compare protections under the current plan with the proposed management area designations, and all existing old growth should be included in this management area designation, with timber production prohibited in these areas. The map of potential management areas for Prince of Wales Island highlights the need for connectivity standards and broader designation of protected old growth. The map shows that the majority of Prince of Wales would be open to logging under the general forest designation, with few areas managed as old growth and limited connectivity among them.¹³
- The timber management standards provide that 3,500 acres of young growth in beach and estuary fringe are added to the suitable acres for logging.¹⁴ No logging should be permitted in beach and estuary fringe. These acres should remain unsuitable for logging.
- The preliminary draft plan also proposes increasing the projected timber sale quantity (PTSQ) to 72 million board feet as more young growth becomes available, but it offers no ecological or market justification for this increase.¹⁵ The PTSQ should be decreased to more accurately match recent timber sale data, not increased without justification.

¹² *Id.* at 85.

¹³ *Id.* at 115.

¹⁴ *Id.* at 99.

¹⁵ *Id.* at 102.

- Riparian area buffers, described in timber standards, are less detailed than under the current plan and provide little assurance of adequate protection.¹⁶ The current 100-foot buffers are not adequate and should be expanded.

These are a few examples of the gaps and other issues in the preliminary draft plan content. By attempting to simplify the forest plan, the Forest Service appears to be leaving out important standards and protections that are needed to meet legal requirements and to ensure a vibrant, healthy forest that supports the needs of the region, retains its globally important carbon-storage potential, prioritizes the needs of Indigenous communities, and sustains the abundant salmon and wildlife populations that support the regions fisheries, recreation, and tourism economies.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "Kate Glover".

Kate Glover
Earthjustice

¹⁶ *Id.* at 104-05.