

**Tongass National Forest  
Five-Year Review of the  
2008 Land and Resource Management Plan**

**Public Outreach and Comment Analysis Report**



**November 2013**



## Acronyms

ADNR	Alaska Department of Natural Resources
ADF&G	Alaska Department of Fish and Game
ADEC	Alaska Department of Environmental Conservation
AEA	Alaska Energy Authority
AMHT	Alaska Mental Health Trust
ANCSA	Alaska Native Claims Settlement Act of 1971
ANILCA	Alaska National Interest Lands Conservation Act of 1980
APA	Administrative Procedures Act
ASQ	Annual Sale Quantity
ATV	All-Terrain Vehicle
BOF, BOG	Alaska Board of Fisheries, Alaska Board of Game
BLM	Bureau of Land Management
BMP	Best Management Practices
CFR	Code of Federal Regulations
CMAI	Cumulative Mean Annual Increment
EA	Environmental Assessment
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act of 2007
EO	Executive Order
ESA	Endangered Species Act
FEIS	Final Environmental Impact Statement
FERC	Federal Energy Regulatory Commission
FP, Forest Plan	1997 and 2008 Tongass National Forest Land and Resource Management Plan
FSM	Forest Service Manual
GHG	Greenhouse Gases
GMU	Game Management Units
HSI	Habitat Suitability Index
IRAs	Inventoried Roadless Areas
LUD	Land Use Designation
LWD	Large Woody Debris
MMBF	Million Board Feet
MUSYA	Multiple Use Sustainable Yield Act
NEPA	National Environment Policy Act
NFMA	National Forest Management Act of 1976
NIC	Non Interchangeable Component
NPDES	National Pollutant Discharge Elimination System
OGR	Old Growth Reserves
ORV	Off Road Vehicles
P.L.	Public Law
POG	Productive Old Growth
RAC	Resource Advisory Committee
ROD	Record of Decision
ROS	Recreation Opportunity Spectrum
RR	Roadless Rule

S&G	Standards and Guidelines
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SEIRP	Draft Southeast Integrated Resources Plan
SOC	Statement of Concern
SSRAA	Southern Southeast Regional Aquaculture Association
NGO	Nongovernmental Organization
TAMS	Tongass Adaptive Management Strategy
TLMP	Tongass National Forest Land Management Plan
TNF or Tongass	Tongass National Forest
TTRA	Tongass Timber Reform Act of 1990
TUS	Transportation and Utility System
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
VCUs	Visual Comparison Units

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# 1.0 INTRODUCTION

## 1.1 PROJECT PURPOSE

The Tongass National Forest (TNF) is operating under the 2008 Tongass National Forest Land and Resource Management Forest Plan (Forest Plan). As promised when the plan was completed, a 5-year review occurred to determine whether any actions are needed to clarify or adjust the plan. The Tongass solicited comments through public and stakeholders meetings, government-to-government consultation with Southeast Alaska tribes, and written comments.

## 1.2 SCHEDULE

The public comment period was open between January and June 30, 2013. The comment period was originally scheduled to close on March 31, 2013, but was extended in order to permit comment on the Conservation Strategy to be incorporated. Steps during the 5-Year Forest Plan review included:

- January through June 30, 2013 – Public comment period open.
- February through March 2013 – Public meetings to discuss the Forest Plan
  - Wrangell February 7
  - Petersburg February 11
  - Sitka February 13
  - Craig February 20
  - Ketchikan February 21
  - Juneau February 28
  - Haines March 25
- June 2013 - Conservation Strategy Summits
  - Ketchikan June 18
  - Juneau June 20
- July 2013 - Comment analysis
- Spring 2014 (Planned) - Results from stakeholder input and responses from the Forest Supervisor to be shared with the public

## 2.0 PUBLIC OUTREACH

### 2.1 PRESS RELEASES

Two Press Releases were issued by the Forest Service in conjunction with this project:

Title: "Forest Service Conducts 5-Year Review of Tongass National Forest Land & Resource Management Plan." Petersburg, AK. Contact: Sue Jennings.

Release Date: Jan 11, 2013

Link: <http://prdp2fs.ess.usda.gov/detail/tongass/news-events/?cid=stelprdb5405601>

Title: "Tongass National Forest – Old-Growth Habitat Conservation Summit."

Ketchikan, AK. Contact: Sue Jennings.

Release Date: May 31, 2013

Link: [http://prdp2fs.ess.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5422740.pdf](http://prdp2fs.ess.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5422740.pdf)

### 2.2 PROJECT BROCHURE

A tri-fold full color brochure was developed in conjunction with this review in order to help inform the public about the process. The brochure was distributed at each of the public meetings and at each of the local Forest Service offices. The brochure is also available online, and was originally published on January 7, 2013.

[http://prdp2fs.ess.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5405638.pdf](http://prdp2fs.ess.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5405638.pdf)

### 2.3 PROJECT POSTCARD

A project postcard was developed to send to addresses of stakeholders with mailing addresses, but no email address. More than 500 postcards were mailed to stakeholder groups for the Tongass in Southeast Alaska on January 11. The address list was based on a contact list developed during the 2008 review process.

### 2.4 PROJECT POSTERS

Project posters were developed to generate interest in the Forest Plan Review, and encourage members of the public to attend a meeting in their local communities. Unique posters were prepared for Wrangell, Juneau, Ketchikan, Sitka, Petersburg, Craig, and Haines. Posters were distributed to Rangers for posting, as well as to local government officials, and others who agreed to hang the posters.

### 2.5 EMAIL NOTICES

Six Constant Contact emails were developed for this project. The contact list of nearly 300 email addresses was originally provided by the Forest Service and augmented by Sheinberg Associates. It included contacts from all the major stakeholder groups for the Tongass in Southeast Alaska, and was based on the contact list developed during the 2008 review process.

Those interested in joining the mailing list could sign up via the project website. During the 2013 public outreach process, all contacts from community public meetings were added to the contact list as well, which grew to more than 450 names.

**Subject: Tongass National Forest Land & Resource Management Plan 5-Year Review.**

Description: This was an introduction to the review process and included a calendar and links to the USFS project website, as well as to the comment form. All subsequent emails included links to the project website, comment form, as well as a reminder of when the comment period was ending.

Date: January 11, 2013

Number of contacts receiving email: 294

**Subject: Tongass National Forest Land & Resource Management Plan 5-Year Review Public Meeting Schedule.**

Description: This notification provided an update to the community schedule.

Date: February 4, 2013

Number of contacts receiving email: 350

**Subject: Forest Plan Comment Period Extended Through June.**

Description: The primary purpose of this notification was to provide the updated end of comment period date.

Date: March 18, 2013

Number of contacts receiving email: 424

**Subject: New Forest Plan Review Documents Available.**

Description: This email provided links to the LUD Roadless Rule Overlay Map along with the Public Meeting Summaries from all seven communities where meetings took place.

Date: April 22, 2013

Number of contacts receiving email: 424

**Subject: Tongass National Forest Conservation Strategy Summit Invitation.**

Description: This invitation provided links to the Juneau and Ketchikan meetings, along with a way to RSVP.

Date: June 4, 2013

Number of contacts receiving email: 434

**Subject: Tongass National Forest Conservation Strategy Summit Documents.**

Description: This document provided links to the Meeting Summary for the June 2013 Conservation Strategy Summits in Juneau and Ketchikan along with the PowerPoint Presentations given at the events. It also acted as a final reminder that the comment period was closing.

Date: June 26, 2013

Number of contacts receiving email: 460

## 2.6 WEBSITE

Website pages for the TNF 5-Year Forest Plan Review were launched on January 11<sup>th</sup>, 2013, and kept up to date during the comment period. The following pages were developed:

**5-Year Review Project:** Page includes a project description, a review process timeline, contact information, an invitation to join the contact list, and a link to the comment form.

Link: <http://prdp2fs.ess.usda.gov/detail/tongass/landmanagement/planning/?cid=stelprdb5367364>

**5-Year Review Comment Form:** Form permitted the public and Forest Service staff to submit comments electronically, as well as to attach documents to these comments.

Link: <http://tnf-5yearreview.com/>

**5-Year Review FAQs:** The following questions were listed, along with answers:

- Why are you doing a five-year review now?
- Who is involved in the five-year review?
- How can I get involved?
- How can I get my name on the mailing list or get more information?
- What happens to the comments?
- Are there other parts to the five-year review?
- Who do I contact if I have questions or just want to discuss the five-year review?
- 5-Year Review Documents

Link: <http://prdp2fs.ess.usda.gov/detail/tongass/landmanagement/planning/?cid=stelprdb5402776>

**5-Year Review Documents:** Page contains all of the relevant documents regarding this review process, including news releases, PowerPoint Presentations, project brochure, public meeting summaries, Forest Plan related links, and links to other five year review efforts.

Link: <http://prdp2fs.ess.usda.gov/detail/tongass/landmanagement/planning/?cid=stelprdb5402852>

**Join the 5-Year Review Contact List:** Permitted interested parties to join the project mailing list.

Link:[http://visitor.r20.constantcontact.com/manage/optin/ea?v=0018h3Tb3KPO7IY-SfwqFD4y1mrLkkwovP80 IVRWnXs-Y0GR\\_gQoxeOFenjO9ABPVilARCqJAqKgAarKsB1h-AKzwRsfjxjdluEcY0ZcJ1L2z9BVD0\\_GdljBY-9JNiSz3K62o81zGYa9dXlvqB8YA\\_htqCqwg0cndtpMuBGtx-bBcw%3D](http://visitor.r20.constantcontact.com/manage/optin/ea?v=0018h3Tb3KPO7IY-SfwqFD4y1mrLkkwovP80 IVRWnXs-Y0GR_gQoxeOFenjO9ABPVilARCqJAqKgAarKsB1h-AKzwRsfjxjdluEcY0ZcJ1L2z9BVD0_GdljBY-9JNiSz3K62o81zGYa9dXlvqB8YA_htqCqwg0cndtpMuBGtx-bBcw%3D)

**Tongass Forest Plan:** This existing page was updated to include an overview of the 2013 plan review project.

Link:<http://prdp2fs.ess.usda.gov/detail/tongass/landmanagement/planning/?cid=stelprdb5402695>

## 2.7 OUTREACH LETTER TO TRIBES

A letter inviting comment and participation from Southeast Alaska’s Tribes was sent to 32 tribes in 16 Southeast Alaska communities, including Angoon, Craig, Haines, Hoonah, Hydaburg, Juneau, Kake, Ketchikan, Klawock, Metlakatla, Petersburg, Seattle, Sitka, Skagway, Wrangell, and Yakutat. The December 12, 2012 letter was sent from Forest Supervisor Forrest Cole.

## 2.8 PUBLIC MEETINGS

Public meetings for the 5-year Forest Plan Review were well advertised. Newspaper display ads were run in six newspapers; public service announcements were run on 11 radio and television stations; posters were put up in seven communities; and information on the events was listed on nine community calendars, appearing both in print and online.

Outreach	Media	Date	Communities
Newspaper Display Ads	Capital City Weekly	February 6 and 20	Wrangell, Juneau, Ketchikan, Sitka, Petersburg, Craig
	Wrangell Sentinel	January 31	Wrangell
	Petersburg Pilot	January 31	Petersburg
	Sitka Sentinel	February 1	Sitka
	Ketchikan Daily News	February 6	Ketchikan
	Juneau Empire	February 17	Juneau
Public Service Announcements PSAs for Radio Stations and TV	GCI TV scanner	February 1-28 (varied by community)	Juneau, Ketchikan, Petersburg, Sitka, Wrangell
	KATH-TV, Channel 5 scanner	February 1-28 (varied by community)	Wrangell, Juneau, Ketchikan, Sitka, Petersburg, Prince of Wales
	KSTK-FM	February 1 to 7; February 11 to 20	Wrangell, Craig
	KFSK-FM	February 1 to 11	Petersburg
	KCAW-FM	February 1 to 13	Sitka
	KRBD-FM	February 12 to 21	Ketchikan & POW

Outreach	Media	Date	Communities
	KFMJ-FM	February 12 to 21	Ketchikan
	KTOO-FM/KRNN-FM	February 18 to 28	Juneau
	KINY-FM	February 18 to 28	Juneau
	KHNS	March 18 to 25	Haines
<b>Community Meeting Posters</b>	Sent to all Rangers to Post around their Communities	Sent prior to each public meeting	Wrangell, Juneau, Ketchikan, Sitka, Petersburg, Craig, Haines
<b>Community Calendar or "Meetings" Listings in Newspapers or Online Sites</b>	Capital City Weekly Meetings	February 6, 13 and 20	Wrangell, Sitka, Petersburg, Juneau, Ketchikan, Craig
	KSTK online calendar	February 1 to 20	Wrangell, Craig
	KCAW-FM online calendar	February 1 to 13	Sitka
	POW Chamber of Commerce	February Calendar	Craig
	KRBD-FM online calendar	February Calendar	Ketchikan and Craig
	Capital Copy Calendar	February Calendar	Juneau
	Chilkat Valley News	Week of March 18	Haines
	Juneau Empire	February 18 to 28	Juneau
	KTOO-FM online calendar	February 18 to 28	Juneau

## 2.9 OTHER

**Project in the Press:** At least eight articles were written or produced by regional news organizations.

Title: Forest Service Conducts 5-Year Review of Tongass National Forest Land & Resource Management Plan

Media: Sitnews

Date: January 15, 2013

Link: [http://www.sitnews.us/0113News/011513/011513\\_tongass\\_review.html](http://www.sitnews.us/0113News/011513/011513_tongass_review.html)

Title: Forest Service to Hold TLMP review, Take Public Input in Sitka.

Media: KCAW – Sitka Public Radio

Date: February 4, 2013

Link: <http://www.kcaw.org/2013/02/04/mon-feb-4-2013/>

Title: Forest Review Editorial

Media: Ketchikan Daily News

Date: February 5, 2013

Link: <http://www.ketchikandailynews.com/free/local-Edit--TLMP-review--020513>

Title: Forest Service Re-evaluates Plan for Tongass  
Media: KSTK – Wrangell, POW Public Radio  
Date: February 7, 2013  
Link: <http://www.kstk.org/2013/02/07/forest-service-re-evaluates-plan-for-tongass/>

Title: Agency Looks for Input on Tongass Plan Review  
Media: KSTK – Wrangell, POW Public Radio  
Date: February 7, 2013  
Link: <http://www.kfsk.org/2013/02/11/agency-looks-for-input-on-tongass-plan-review/>

Title: TLMP future: How best to manage the Tongass  
Media: Ketchikan Daily News  
Date: February 23, 2013  
Link: <http://discussion.ketchikandailynews.com/article.php?sid=7413>

Title: Forest Service expanding comment period for Tongass  
Media: KTOO – Juneau Public Radio  
Date: February 26, 2013  
Link: <http://www.ktoo.org/2013/02/26/forest-service-expanding-comment-period-for-tongass/>

Title: Scientists ask for protections on salmon in Tongass  
Media: Juneau Empire  
Date: June 11, 2013  
Link: <http://juneauempire.com/state/2013-06-11/scientists-ask-protections-salmon-tongass>

In addition to the press received, many government officials wrote articles on for their online forums to encourage their constituents to respond to the Forest Service during the comment period. Some of these are listed below:

Title: Tongass National Forest Land & Resource Management Plan Review  
Link: <http://www.peggywilson.com/?p=2773>

Title: Tongass National Forest Land & Resource Plan  
Link: <http://www.wrangell.com/administration/tongass-national-forest-land-resource-plan-public-meeting>

Title: Tongass National Forest Land & Resource Management Plan-5 year Review:  
Link: <http://craigtribe.org/News.php>

Title: Tongass National Forest Management Plan 5-Year Review  
Link: <http://bertstedman.com/new/?p=2768>

## 3.0 ANALYSIS OF PUBLIC COMMENT

### 3.1 INITIAL COMMENT CODING

This section provides an overview of the methods employed in reviewing, analyzing, and developing Statements of Concern during the public comment period.

Public comments on the Tongass National Forest 5-Year Forest Plan Review were received as oral and written testimony at public meetings in Craig, Haines, Juneau, Ketchikan, Petersburg, Sitka and Wrangell, and as written comments received through the project website, mail, fax, and email. Comments were submitted by individual citizens, as well as groups including: federal agencies, tribal governments, state agencies, local governments, businesses, special interest groups, and non-governmental organizations.

There were a total of 257 unique “submissions” received by the Tongass National Forest during the comment period and uploaded to the comment analysis database. The term submission refers to the entirety of oral testimony at a public meeting, a letter, an e-mail message, or a fax transmission. Most submissions include many “comments,” a term which refers to each of the discrete concepts conveyed in a submission.

There were 152,182 form letters received and reviewed. Form letters were received in seven different formats from five non-governmental organizations. The template of the form letters are coded once based on the content of the submission and each duplicate submission with the same content was considered another signer of the form letters. The breakdown of form letters received by organization is described in Table 1.

**Table 1: Summary of Form Letter Submissions Received**

Organization	Form Letter	Non Unique	Unique	TOTAL
Sierra Club	Protect the Tongass	12,638	668	13,306
National Audubon Society	Comments on the 5-year review of the Tongass Land Management Plan	8,431	674	9,105
Earthjustice	Please Protect the Tongass and Begin Rapid Transition from Old-Growth Logging	44,564	1,631	46,195
Earthjustice	Please protect the old-growth Tongass rainforest	18,890	978	19,868
Alaska Wilderness League	Logging Practices in the Tongass National Forest	22,512	3,710	26,222
Natural Resource Defense Council (NRDC)	End large-scale, old-growth logging in the Tongass	35,783	1,559	37,342
Earthjustice	Retire Old-Growth Logging In America's Rainforest	144	0	144
<b>TOTAL</b>		<b>142,962</b>	<b>9,220</b>	<b>152,182</b>

Form letters received were compared and reviewed during this process and it became clear that some of the form letters contained an additional non-substantive comment that made them appear unique, while others contained a special character that also made them appear “unique”, such as an exclamation point or extra comma/period, when compared to the original form letter. Since these letters were generated using a template, it was clear that the intent of the letter and concerns expressed were already captured in the comment coding process. Names were uploaded into the database exactly as submitted on the 152,182 form letters, even if they contained all caps or all lowercase. In cases where text of the form letter email was obviously invalid or a name was not provided, the word “Anonymous” was substituted for the name in order to get an accurate count of total submissions for each form letter.

There were 3,710 form letters submitted that contained an additional unique comment from the Alaska Wilderness League’s 26,222 comments. These files were received via excel spreadsheets, and some of the Alaska Wilderness League comments contained strange values within the file. As a result some of the values would not import into the database while others did. For example, a long string such as this: ÃÉÊËÃÇÄÉÊËÇÄÇÄÉÊËÊËÇÄÇÄË. Depending on the size of the data (usually equal to length of characters), the database would either accept it, cut it off when the database hit the size limit, or enter an empty value. Many other Alaska Wilderness League comments on the submitted excel spreadsheet had comments that were simply cutoff.

The Earthjustice form letter called “Retire Old-Growth Logging in America’s Rainforest” was part of an online petition for which 144 notification emails were received that an individual or individuals had signed the petition. These notification emails did not contain a list of signers and the text did not contain any indication of the names or number of signers, therefore, this form letter is simply categorized as 144 submissions.

A substantive comment was found on 435 of the 152,182 form letters received, and the substantive portion of these letters were coded as a unique submission.

The project coding team read and analyzed the unique submissions and form letter templates for substantive comments. The project coding team then assigned issue topic codes to each comment, based on the content of the comment. For example, a comment that related to Recreation would be coded “REC”. Each comment entered in the database also received an automatic tracking number (Comment ID) by the Comment Analysis System database. For example, an email from the Organized Village of Kake was Submission 92 and it contained eight individual comments, each of which received a Comment ID number. All comments (that were not submitted via form letter) were sorted to an excel file called: Tongass\_ConcernItemTracking, which contains the unique comments. Separate excel files were created for each of the seven form letters.

The comment period generated 3,104 coded comments.

The issue topics and issue codes used in the comment coding process are listed in Table 2. There are five issue topics for which no comments were submitted (noted with an asterisk in the table).

**Table 2: Issues by Topic and Code**

GROUP	ISSUE TOPIC	ISSUE CODE	ISSUE SUMMARY
TIMBER	<b>Increase Timber Harvest /Timber Supply</b>	TIM 1	Comments related to the need to increase the board feet or acres available on the Tongass to harvest, including harvest levels not economically viable, not enough Annual Sale Quantity (ASQ.)
	<b>Reduce Timber Harvest /Timber Supply</b>	TIM 2	Comments about the need to reduce board feet or acres available on the Tongass to harvest, including reducing old growth cut or clear-cutting, smaller ASQ; scale needs to be reduced and transition to young growth framework.
	<b>Young Growth (or second growth - generally synonymous terms)</b>	TIM 3	Comments about young growth/second growth, the young growth strategy, the transition framework to young growth-based /second growth based harvesting, the supply of young growth, how long it will take or the rate of change before young growth can be economically harvested, and management of previously harvested forest.
	<b>Sales</b>	TIM 4	Comments about specific timber sales (e.g. Wrangell 10-year sale, Big Thorne sale, etc).
	<b>Timber Demand</b>	TIM 5	Comments related to the market demand for timber that the USFS should provide, or is required to provide, under the Tongass Timber Reform Act, or other reasons. Also comments about problems with how USFS/Tongass is calculating timber demand and the timber market.
	<b>Industry Capacity</b>	TIM 6	Comments related to the need to or the ability of different parts of the timber industry to harvest and process timber; how much processing capacity exists, where is the capacity, how does it line up with where timber supply is offered, the need to retool sawmills and equipment for young growth/smaller diameter wood, and similar.
	<b>Thinning or Restoration</b>	TIM 7	Comments related to where, when, and at what pace thinning or pre-commercial thinning are done; about how we invest in future stands now; about what is the desired future condition for riparian fringe, etc that are no longer development LUDs (because timber harvest is completed.)
	<b>Special Forest Products</b>	TIM 8	Comments related to the management of, or commercial uses of, non-timber forest products such as berries, mushrooms and other plants, bark, etc.

GROUP	ISSUE TOPIC	ISSUE CODE	ISSUE SUMMARY
	<b>Other</b>	TIM 9	Comments related to specific changes in timber management or harvest that do not fit one of categories above, such as selective harvest, music wood, stewardship contracting, firewood, timber salvage, Legacy Habitat, cedar, karst, other. Comments about past practices, historic harvest and legacy harvests.
	<b>Transition</b>	TIM 10	Comments specific to the volume and amounts of harvest of bridge timber that is needed to accomplish the May 2010 Transition policy.
	<b>Export</b>	TIM 11	Comments specific to the export of timber from the Tongass National Forest.
<b>GENERAL ECOLOGICAL</b>	<b>Forest</b>	ECO 1	Comments regarding the enduring value of, or need for protection of, old growth forests, public forest land, or national forests generally. (Note that more specific comments about timber management would be found under TIM.)
	<b>Ecosystems or Environment</b>	ECO 2	Comments regarding the enduring value of, or need for protection of, the intact environment or ecosystems on the Tongass National Forest. (Note that more specific comments about ecosystem protection are found in other sections, such as AQUA, TERR, WCS.)
<b>VISITOR SERVICES</b>	<b>Outfitters and Guides</b>	TOUR 1	Comments about the management, monitoring, or permitting related to commercial outfitter and guide activities and tours including cruise ships, heli-skiing tours, snowmobiling tours, hiking tours, and similar activities. Also, comments about Visitor Industry Cluster.
	<b>Guided Hunting</b>	TOUR 2	Comments about the management, monitoring, or permitting related to guided hunting.
	<b>Other</b>	TOUR 3	Comments about commercial services for visitors.
<b>MINING</b>		MINE	Comments related to mining, mineral exploration, and development of mines, including providing reasonable access, impact of re-imposition of the Roadless Rule, the need for expedited permitting, the importance of hydropower for developing mines on POW Island and elsewhere, and issues with the 1872 Mining Act.
<b>FISHING (not fish habitat)</b>	<b>Hatcheries</b>	FISH 1	Comments about fish enhancement including hatcheries, net pens, and stocking lakes or streams with hatchery fish.
	<b>Mariculture</b>	FISH 2	Comments about mariculture, including upland support.
	<b>Other</b>	FISH 3	Comments about other commercial or sport fishing related, NOT including salmon/fish habitat which go to AQUA 1.

GROUP	ISSUE TOPIC	ISSUE CODE	ISSUE SUMMARY
ENERGY	Hydropower	ENER 1	Comments about the need for or location of hydroelectric projects, location of corridors for power lines, interties.
	Biofuel	ENER 2	Comments about the need for or use of wood for biofuels, use of slash and wood for biofuels, management for biofuels, location of biofuel or pellet plant, volume of wood needed for biofuel or pellet plants.
	Other	ENER 3	Comments about any other energy related topics including tidal, geothermal or wind power that are not covered by what is above, and comments whose gist is about many renewable energy resources or renewable resources in general (including topics in ENER 1 and 2). This also includes comments about Renewable Energy Cluster, unless covered by ENER 1 or ENER 2. Note that comments asking for new Renewable Energy LUD are coded to LUD-New/Energy.
CUMULATIVE EFFECTS		CUMUL	Comments on cumulative effects on forest resources, or cumulative effects of multiple resources, or of other things that are happening and may have an effect, or of multiple landowners in the region. Note that comments about multiple use or effects of an action on multiple resources were coded to Socio-3.
RECREATION		REC	Comments regarding recreational (non-commercial) use, management, monitoring, or activities.
TRANSPORTATION	Road Maintenance	TRAN 1	Comments made regarding road maintenance, closures, water-barring, storage, culvert-pulling or opening.
	ORV/ATV use or management	TRAN 2	Comments about Off Road Vehicles (ORV) or All-Terrain Vehicle (ATV) trails, use, or management.
	Access and Travel Management Plans	TRAN 3	Comments about the Access and Travel Management planning process and completed plans, other roads, or other transportation related planning efforts.
	Other	TRAN 4	Comments on transportation that are not TRAN 1, TRAN 2, or TRAN 3, including comments related to helicopters, motorized versus non-motorized use, or other access concerns.
PORTS, HARBORS, OR LTFs		PORT	Comments made regarding the location or management of ports, harbors or log transfer facilities (LTFs)..
SOCIO-ECONOMICS	Socioeconomic Conditions or Changes to Conditions	SOC 1	Changes in social or economic conditions or impacts to local communities, regional economy, or national economy since the 2008 Forest Plan was prepared, that must be considered as the Forest Plan is updated. This section also

GROUP	ISSUE TOPIC	ISSUE CODE	ISSUE SUMMARY
			includes comments about the role or contribution of different economic sectors in the region.
	<b>Forest Service Role and Responsibility re: Socioeconomic Conditions</b>	SOC 2	Comments about the Forest Service's role in the economy of Southeast Alaska and its communities, including comments related to: 1) The Forest Service's role in supporting economic opportunities and jobs and addressing the current difficult economic conditions in rural Southeast Alaska; 2) The "Triple Bottom Line", or 3) Urging the Forest Service to focus its policies, energy and resources to stimulate and support particular industries or economic sectors.
	<b>Forest Service – Multiple Use</b>	SOC 3	Comments related to managing the Tongass for multiple use, finding the balance among uses, and concerns about impacts of one or more use(s) on other resources and uses.
<b>ROADLESS RULE</b>		RR	Comments on effect of the Roadless Rule (RR) and about Inventoried Roadless Areas (IRA). This includes comments on the Forest Plan/TLMP, that the Forest Plan didn't consider the RR, effect of RR on ability of forest to produce goods and services, on timber harvest, LUDs, on ASQ, about areas now off limits due to Roadless Rule and so on. Requests to reengage in rulemaking to exempt the Tongass from the Roadless Rule are here also.
<b>WILDLIFE (OR OLD GROWTH) CONSERVATION STRATEGY</b>	<b>Wildlife Conservation OR Old Growth Conservation Strategy OR Conservation Strategy</b>	WCS 1	Comments about Standards & Guidelines (S&Gs) related to wildlife conservation; Management of the Matrix (area between the Old Growth Reserves.)
	<b>Old Growth Reserves</b>	WCS 2	Comments about Old Growth Reserves.
<b>TERRESTRIAL HABITAT</b>	<b>Deer</b>	TERR 1	Comments about the management of habitat, habitat requirements; or potential impacts to habitat for deer; also about species population/abundance; or deer as prey species for wolves.
	<b>Wolves</b>	TERR 2	Comments about management of habitat, habitat requirements, or potential impacts to habitat for wolves; also about species population/abundance.
	<b>Other</b>	TERR 3	Comments about terrestrial habitat and wildlife comments (not related to deer and wolves.)

GROUP	ISSUE TOPIC	ISSUE CODE	ISSUE SUMMARY
AQUATIC HABITAT	Salmon, Steelhead, and Other finfish	AQUA 1	Comments about management of habitat, habitat requirements, or potential impacts to habitat for salmon, steelhead, and other finfish, or about species populations/abundance.
	Other	AQUA 2	Comments about other aquatic habitat including impacts to streams or watersheds, and ability to support fisheries, comments about culvert replacements for fish access to habitat, about water flow and water yield, and comments for or against the "Tongass 77" proposal.
SUBSISTENCE	Deer	SUB 1	Comments about the value of, need for, protection of, or impact to deer for subsistence, food, or traditional and customary uses.
	Salmon, Steelhead and Other Fish	SUB 2	Comments about the value of, need for, protection of, or impact to salmon, steelhead and other fish for subsistence, food, or traditional and customary uses.
	Other	SUB 3	Comments about the value of, need for, protection of, or impact to other forest resources for subsistence, food, or traditional and customary uses.
CULTURAL AND HERITAGE		CULT	Comments about Alaska Natives, Alaska Native values, cultural and heritage sites and management, sense of place, sacred sites, Tongass as a Native place and place for interaction with Alaska Native culture, tribal recognition, traditional ways, and place knowledge. Also includes comments about the perspective and considerations of heritage of European settlers.
TONGASS NATIONAL FOREST MANAGEMENT	Monitoring & Evaluation	MAN 1	Comments about the Tongass National Forest Monitoring and Evaluation program.
	Process or Type of Plan Change Needed	MAN 2	Comments regarding the 5-year Forest Plan review (including the type of plan change needed), National Planning Rule, National Environmental Policy Act, and Forest Service permitting.
	Land Ownership	MAN 3	Comments related to new or pending land ownership changes, including Sealaska land bill, state forest, AMHT, landless claims by Alaskan Natives.
	Integrated Resources Mgmt. Plan	MAN 4	Comments related to the Integrated Resource Management Plan or on adaptive management.
	Comments on Goals & Objectives, or Standards & Guidelines	MAN 5	Comments about the Tongass Forest Plan's Goals and Objectives, and Standards & Guidelines, which are not linked to the Wildlife Conservation Strategy. Note that comments about Standards & Guidelines that are part of the Wildlife Conservation Strategy are found in WCS 1).

GROUP	ISSUE TOPIC	ISSUE CODE	ISSUE SUMMARY
	<b>Government to Government</b>	MAN 6	Comments about the Forest Service and Tribe's government-to-government relationship and tribal consultation.
	<b>Missing</b>	MAN 7	Comments that the entire topic is missing from the Forest Plan and must be added; many parts of the Forest Plan need changed to address this topic.
	<b>Federal Policy, Directives</b>	MAN 8	Comments and concerns that the Forest Service is or has not followed federal policy, executive orders (EO) or management directives.
	<b>Transition</b>	MAN 9	Comments supporting implementation of the May 2010 Transition Framework on the Tongass, including comments more generally requesting a transition or "shift" from a focus old growth logging to more sustainable logging practices and young growth management, and/or to increasing support for industries such as fisheries, tourism and recreation, which commenters describe as more sustainable for the long-term.
<b>EMERGING ISSUES</b>	<b>New Scientific Info</b>	SCIENCE	Comments about scientific information that is new or has changed substantially since 2008. Also about support for use of best available science.
<b>MISC</b>	<b>Acknowledge</b>	ACKN	The entire comment submission determined not to be substantive and warranted only a "comment acknowledged" response and/duplicate comments.
	<b>Data</b>	DATA	Comments about data or specific studies for the USFS to incorporate into its analysis of the 2008 Forest Plan and as it considers any changes to the plan. (Note: Submission ID is provided so the USFS and others can go to the comment source for the full citation, data, and explanation of the reason the data or study was referenced.)
	<b>Editorial</b>	EDIT	Comments with specific text edits.
<b>LUD</b>	<b>Wilderness &amp; Wilderness National Monument</b>	LUD-W	Comments about the Wilderness & Wilderness National Monument Land Use Designation (LUD) or to the general topic of Wilderness.
	<b>Non-Wilderness National Monument</b>	LUD-NW	Comments about any issue related to Non-Wilderness National Monument Land Use Designation (LUD).
	<b>LUD II (Congressionally Designated Wilderness)</b>	LUD II	Comments on any issue related to Land Use Designation (LUD) II.
	<b>Old Growth Habitat</b>	LUD-OGH	Comments on any issue related to Old Growth Habitat Land Use Designation (LUD).
	<b>Research Natural Areas *</b>	LUD-RNA	Comments about any issue related to Research Natural Areas (LUD).

	<b>Semi-Remote Recreation</b>	LUD-SRR	Comments about any issue related to Semi-Remote Recreation Land Use Designation (LUD).
	<b>Remote Recreation</b>	LUD-RR	Comments about any issue related to the Remote Recreation Land Use Designation (LUD).
	<b>Municipal Watershed *</b>	LUD-MW	Comments about any issue related to Municipal Watershed (LUD).
	<b>Special Interest Area</b>	LUD-SIA	Comments about any issue related to Special Interest Area Land Use Designation (LUD).
	<b>Wild, Scenic or Recreational River *</b>	LUD-WSRR	Comments about any issue related to Wild, Scenic or Recreational River (LUD).
	<b>Scenic Viewshed</b>	LUD-SV	Comments about any issue related to Scenic Viewshed Land Use Designation (LUD).
	<b>Modified Landscape *</b>	LUD-ML	Comments about any issue related to Modified Landscape (LUD).
	<b>Experimental Forest *</b>	LUD-EF	Comments about any issue related to Experimental Forest (LUD).
	<b>Timber Production</b>	LUD-TP	Comments about any issue related to the Timber Production Land Use Designation (LUD).
	<b>Minerals Overlay LUD</b>	LUD-MIN	Comments about any issue related to the Mineral Overlay LUD.
	<b>Transportation and Utility System Overlay LUD</b>	LUD-TUS	Comments about the Transportation and Utility System (TUS) overlay LUD, about existing and proposed state road corridors and existing and proposed power transmission corridors.
	<b>Proposed New LUDs</b>	LUD-New/Communities	Comments requesting or related to a NEW Community Economic Development LUD or Sustainable Community LUD.
		LUD-New/Energy	Comments requesting or related to a NEW Renewable Energy Development LUD.
		LUD-New/Other	Comments requesting or related to a NEW LUD (other than Energy, Trees or Community) and other general comments requesting changes to LUDs.
		LUD-New/Tree	Comments requesting or related to a new Tree Farm LUD.

<b>GEOGRAPHY</b>	<b>By Ranger District</b>	<b>GEO</b>	Geography to which comment refers (stream, island, river, community, etc)
<b>GEOGRAPHY</b>	<b>By Ranger District</b>	<b>GEO-KET</b>	Ketchikan-Misty Fiords Ranger District
<b>GEOGRAPHY</b>	<b>By Ranger District</b>	<b>GEO-CRAIG</b>	Craig Ranger District
<b>GEOGRAPHY</b>	<b>By Ranger District</b>	<b>GEO-TB</b>	Thorne Bay Ranger District
<b>GEOGRAPHY</b>	<b>By Ranger District</b>	<b>GEO-WRG</b>	Wrangell Ranger District
<b>GEOGRAPHY</b>	<b>By Ranger District</b>	<b>GEO-PTR</b>	Petersburg Ranger District

GEOGRAPHY	By Ranger District	GEO-SITKA	Sitka Ranger District
GEOGRAPHY	By Ranger District	GEO-HOO	Hoonah Ranger District
GEOGRAPHY	By Ranger District	GEO-JUN	Juneau Ranger District
GEOGRAPHY	By Ranger District	GEO-ANM	Admiralty National Monument Ranger District
GEOGRAPHY	By Ranger District	GEO-YAK	Yakutat Ranger District
GEOGRAPHY	----	GEO-POW	Comments referring to Prince of Wales Island in general
* (Note: No comments were received under this Issue Topic)			

### 3.2 STATEMENTS OF CONCERN

The unique submissions generated 3,104 comments, which were grouped into 24 Statement of Concern Topics and Statements of Concern. Statements of Concern (SOC) are summary statements intended to capture the different themes identified in the substantive comments. The term SOC refers to a summary statement that captures the common point of several related substantive comments. Every substantive comment was assigned to a SOC based on its content. When related comments are summarized together, a total of 515 SOCs resulted. Each SOC is represented by an issue category code followed by a number.

Comments on a NEPA document (such as a Draft Environmental Impact Statement), typically generate many comments, but each topic is fairly discrete. Comments received on the Tongass Forest Plan 5-Year review were more complex. For example, a single sentence could contain comments about the Roadless Rule’s impact on restricting timber harvest as well as access for hydroelectric power and also urge that the Forest Service engage in rulemaking to reinstitute the terms of the 2003 Settlement Agreement. The next sentence could build on this theme and cite a specific situation on Prince of Wales Island where this has or is causing a problem. Recognizing this complexity, the Forest Service asked the coding team to ensure that if a comment covered more than one topic, that it be coded to multiple topics. Also, if it referenced a specific place (such as a community, stream, or island), that it also be coded to “geography” so a list could be generated for each District Ranger about comments within their management areas.

When a comment was assigned to multiple topics, we indicated this with square brackets [ ] in the coded comment. Each topic that the comment was coded to was listed in the bracket. In the example cited above, the comment would have coded to four topics: Roadless Rule (RR), Timber (TIM-1), Energy-hydroelectric (ENER-1), and Geography-Prince of Wales Island (GEO-POW). In the comment database, the comment would be thus preceded by this notation: [RR, TIM 1, ENER 1, GEO-POW]. One can see that in this realistic example, a single comment would be coded to four different SOC topics; therefore, there is some duplication in the SOCs. The SOCs are not identical, but similar themes exist. In the SOCs we identify many of the places where there is a similar SOC in another topic.

This methodology resulted in more SOC's than there would be if each comment was coded to only one place and each SOC was completely unique. Despite making this document longer and creating more SOC's, one benefit will be that if, different Forest Service staff are assigned to review and address different topics, the full suite of related and contextual material should generally be captured in the SOC's for that one topic.

Among the comments received, some issues were raised more frequently than others. The five SOC Topics with the most comments received are:

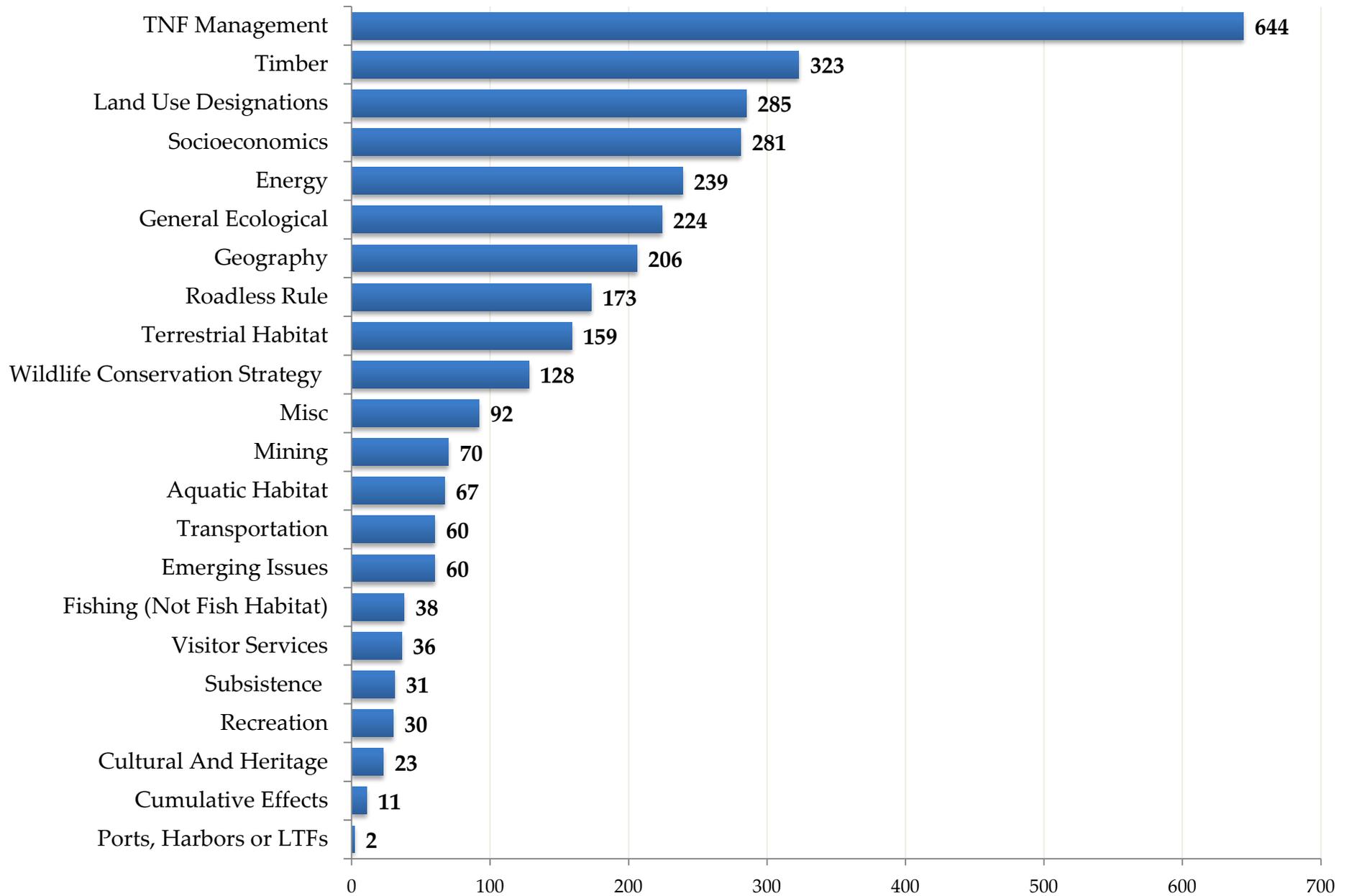
1. Tongass National Forest Management issues
2. Timber
3. Land Use Designations
4. Socio-economics
5. Energy

The graph on the next page shows how many unique comments were received for each of the 24 Statement of Concern topics.

Of the 515 different, individual SOC's, by far the most comments were received for two SOC's: Tongass National Forest Management MAN 9-A, the SOC with general comments supporting the Transition Framework, and, the General Ecological SOC with comments about the enduring value of, or need for, old growth forests and public forest land (ECO 1-A). These two SOC's received the most comments because these were almost exclusively the two themes repeated in the 435 form letters that included an additional unique comment and were thus coded individually.

The 17 individual SOC's that each received 30 comments or more, are listed on Table 3.

## Number of Comments for Each Statement of Concern Topic



<b>Table 3: Individual Statements of Concern with Most Comments</b>	<b>No. of Comments</b>
MAN 9-A. General comments supporting implementation of the May 2010 Transition Framework on the Tongass.	325**
ECO 1-A. General statements of support for protection of old growth forests and public forest lands for the values they support.	176**
GEO-PTR. Comments specific to the Petersburg Ranger District.	68
RR-1. Comments asking to amend/revise the Forest Plan because application of the Inventoried Roadless Areas was a significant change.	65
DATA-A. Comments requesting additional data and studies to be reviewed by the Forest Service during the Forest Plan review.	56
WCS 1-A. General comments in support of upholding and strengthening the wildlife conservation strategy.	50
TIM 2-A. Comments about reducing timber harvest and old growth logging.	49
ECO 2-A. General statements in support of protection of Tongass Forest ecosystems (not as specific to old growth or forest protection, as in ECO 1-A).	48
SOC 2-A. Comments regarding difficult economic conditions in many rural communities in Southeast Alaska, and the importance of Forest Service management actions to the economic sustainability of the region, communities, and families.	48
GEO-KET. Comments specific to the Ketchikan Ranger District	37
TERR 3-A. Comments that a strong/strengthened Forest Plan and wildlife conservation plan is essential to providing effective protection for the Queen Charlotte goshawk and preventing its listing under the Endangered Species Act.	37
RR-2. Comments that the terms of the June 10, 2003 Settlement Agreement were not fulfilled and the rulemaking needs to be done again to resolve the legal issues raised by the Court, and comments similar to this.	36
SOC 2-H. Comments requesting a revision to the Forest Plan and to take action to provide the resources to support a sustainable forest products industry in Southeast Alaska.	36
TERR 2-A. Comments that a strong/strengthened Forest Plan and wildlife conservation plan is essential to providing effective protection for the Alexander Archipelago Wolf and preventing its listing under the Endangered Species Act.	33
SOC 2-G. Comments requesting development of a Renewable Energy Resource Plan and Renewable Energy Resource Development Land Use Designation (LUD) as a primary means of providing affordable, sustainable energy and spurring economic development in Southeast Alaskan communities and the region.	31
TERR 1-A. Comments that the existing Forest Plan (including the wildlife conservation strategy), its implementation, and monitoring has not provided effective protection for deer populations, particularly due to the levels of old growth clearcut logging and harvest in deer winter range.	31
TUS LUD-1. Comments asking to amend Transportation Utility System (TUS) criteria to allow the TUS LUD to apply to hydropower projects and all other renewable energy projects within TUS Avoidance Areas. TUS sites and corridors should overrule the underlying LUD.	30
<i>** These two SOC's received the most comments because these were almost exclusively the two themes repeated in the 435 form letters that included an additional unique comment and were thus coded individually.</i>	

## 4.0 STATEMENTS OF CONCERN

### 4.1 AQUATIC HABITAT – SALMON, STEELHEAD, AND OTHER FINFISH (AQUA 1)

Comments about management of habitat, habitat requirements, or potential impacts to habitat for salmon, steelhead, and other finfish, or about species populations/abundance.

#### 4.1.1 Comment Analysis

A total of 32 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Electric Light and Power Company, Alaska Forest Association, Alaska Power and Telephone, All Aboard Yacht Charters & Southeast Alaska Wilderness Tours Association, Cascadia Wildlands, First Things First Alaska Foundation, Ketchikan Chamber of Commerce, Pioneer Alaskan Fisheries, Inc., Responsible Cruising in Alaska, Sitka Conservation Society, Southeast Alaska Fishermen’s Alliance, Southeast Conference, The Nature Conservancy, Trout Unlimited, and United Southeast Alaska Gillnetters. Comments were also submitted by Alaska State Representative Cathy Munoz, former Governor and former Senator Frank Murkowski, and by the City and Borough of Juneau. Other comments came from the Petersburg public meeting and unaffiliated individuals. One comment on this topic came from a form letter.

Half of the comments in this topic area were coded to SOCs AQUA 1-B or AQUA 1-C, both of which emphasize maintenance and protection of fish habitat. Nearly a third were coded to AQUA 1-A, which recommends maintaining productivity of fish habitat to the extent feasible. The remainder of the SOCs for topic AQUA 1 had one or two comments each.

#### 4.1.2 Statements of Concern

AQUA 1-A	<u>Maintain the present and continued productivity of anadromous fish and fish habitat to the extent feasible.</u>
AQUA 1-B	The Tongass Forest's <u>top priority should be to manage the forest in a manner that protects salmon habitat.</u> Fish habitat protection should be given the highest priority due to its importance for subsistence, commercial and sport use. Fish is the most valuable commodity produced on the Tongass and fish habitat needs to be given priority over other uses.
AQUA 1-C	The Tongass should use its authorities to ensure that uses and activities such as mining, timber harvest, and other activities on the forest are done in a manner that <u>maintains productivity of salmon habitat.</u> Specific recommendation made that streams in areas proposed for timber harvest be thoroughly surveyed before timber sale decisions are made.

AQUA 1-D	<p><u>Logging is not a threat to fish habitat</u>. Fish populations have more than doubled in SE Alaska since the mid-1950s, particularly in the most heavily logged watersheds. The minimal amount of timber harvest since the Tongass Timber Reform Act (TTRA) of 1990 has not had an impact on fish.</p>
AQUA 1-E	<p>The forest should <u>evaluate the effects of past management and activities on fish habitat</u> and production, and project the effects of various future management scenarios on fish habitat and production. In comments, information was requested about:</p> <ul style="list-style-type: none"> <li>• current fish production</li> <li>• fish production prior to industrial logging (1954)</li> <li>• projected fish production under various management regimes and environmental conditions (including climate change)</li> <li>• effectiveness of the 1977 TLMP and 2008 Forest Plan in changing past logging practices and protecting fish habitat, and evaluating if changes should be made in the future to protect fish habitat</li> </ul>
AQUA 1-F	<p>The forest should present <u>information about damage to stream habitat and rehabilitation</u>. In comments, information was requested about:</p> <ul style="list-style-type: none"> <li>• list of all water bodies with habitat damage adversely affecting commercial salmon runs and the current condition of those water bodies</li> <li>• estimated economic impact in terms of number/pounds of fish lost to the commercial fishing sector annually</li> <li>• estimated cost to restore the affected fish habitat</li> <li>• results of any rehabilitation or mitigation actions already taken</li> <li>• cost/benefit for fish habitat restoration</li> </ul> <p>As the plan is currently structured, it is difficult to see what the effects of past practices are on fish habitat and production, how much it would cost to remediate them, and what the benefits would be.</p>
AQUA 1-G	<p>The relationship of <u>water temperature and other water quality and ecological parameters to fish habitat productivity</u> is different on the Tongass than in other areas where logging occurs (e.g. lower 48 states). The Forest Plan must acknowledge these differences and incorporate these relationships into its management of habitat. Examples submitted include:</p> <ul style="list-style-type: none"> <li>• 2-3 degrees Celsius water temperature can damage a run of salmon or their prey species as was shown on Kodiak.</li> <li>• Estuarine damage can have effects on osmoregulation of smolt.</li> </ul>

	<ul style="list-style-type: none"><li>• River system velocity can scour out spawning areas during the tender egg stage before salmon eggs eye up removing year classes in a storm event.</li><li>• The relationships of colder water slower growth of macro invertebrates, the detritus they feed on, and the fish that prey on them is not adequately recognized.</li><li>• Upwelling of water from tiny tributaries during dry weather events can remove spawning areas.</li><li>• Chemical, physical, and thermal pollution is cumulative.</li></ul> <p>Similar themes are found in SOC CUMUL 3.</p>
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## 4.2 AQUATIC HABITAT – OTHER (AQUA 2)

Other aquatic habitat comments included impacts to streams or watersheds, and ability to support fisheries, comments about culvert replacements for fish access to habitat, about water flow and water yield, and comments for or against the “Tongass 77” proposal.

### 4.2.1 Comment Analysis

A total of 34 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Audubon, Alaska Wilderness League, Cascadia Wildlands, Sealaska Corporation, Sitka Conservation Society, Southeast Alaska Conservation Council, The Nature Conservancy, and Trout Unlimited. Comments also came from former Governor and former Senator Frank Murkowski; the Craig, Ketchikan, Petersburg public meetings; and unaffiliated individuals. No comments on this topic came from a form letter.

The comments were well-distributed among the nine SOCs for this topic, with AQUA 2-A (watersheds mentioned for protection), 2-B (support for Tongass 77), 2-E and 2-F (safeguard intact watersheds) having five to seven comments each. The remaining SOCs each had one to three comments.

### 4.2.2 Statements of Concern

AQUA 2-A	<p>The following streams or <u>watersheds were specifically mentioned for their fish habitat value that should be protected:</u></p> <ul style="list-style-type: none"> <li>• Unuk River - feeds essential spawning habitat for all five species of Pacific salmon and is under threat from KSM mine in northern British Columbia</li> <li>• Unuk River - currently has low numbers of hooligan and no longer open to subsistence fishing; there is no baseline water quality data or data about acid runoff from past mining</li> <li>• Kupreanof Island has high value watersheds that should be protected for salmon habitat, including Irish Creek, Keku Lakes and Creek, Kushneahin Lakes and Creek, Lovelace, Totem Bay, Tunehean Creek, Petersburg Lake and Creek.</li> <li>• Other high value watersheds that should be protected include Port Houghton watershed on the mainland south of Juneau and Thoms Place watershed on Wrangell Island watersheds.</li> <li>• Watersheds of upper Tenakee Inlet, including Saltery Bay, Seal Bay, Long Bay, Goose Flats, head of Tenakee Inlet-Fish Bay</li> <li>• Stikine River watershed - under threat from Red Chris mine in Canada; concern that Canada will not adequately address water quality protections in permitting and when mine is closed</li> </ul>
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AQUA 2-B	The watersheds listed in the Trout Unlimited <u>Tongass 77 Proposal</u> should be <u>protected</u> . These watersheds represent the best of the best in the Tongass and deserve Congressional protection. The information and data made available on these watersheds should also inform the USFS as it plans and implements projects of all type on the Tongass.
AQUA 2-C	<u>Do not support the Trout Unlimited Tongass 77 Proposal</u> . The Tongass Timber Reform Act of 1990 and subsequent Forest Plans provide adequate fish habitat protection.
AQUA 2-D	The Forest Plan should <u>assess which watersheds are most important</u> contributors or potential contributors to salmon production to inform decisions about restoration, management and protection. Consider changing LUDs as needed to provide protection for the highest value watersheds.
AQUA 2-E	The Tongass needs to assess, prioritize, plan for and take action to <u>accelerate watershed restoration and address unmet needs</u> (e.g. identified backlog of \$100 million for watershed restoration and indicated that it will take 50 years to address these major impacts to Tongass watersheds). Recommend reassigning staff and reallocating budget (e.g. from timber and roads budget) to developing a "restoration pipeline" and implementing watershed-scale restoration projects. Need shovel-ready projects to take advantage of funding and partnership opportunities.
AQUA 2-F	The Tongass should <u>safeguard intact watersheds, through protection of those intact areas and/or application of watershed-level management strategies to ensure the abundance and diversity of the salmon populations</u> . Undisturbed, whole watersheds provide the best habitat for salmon, as well as providing other ecosystem services, and are most resilient (e.g., to climate change).
AQUA 2-G	<p><u>Comments regarding the design and treatment of stream and coastline buffers:</u></p> <ul style="list-style-type: none"> <li>• Recommend that <u>buffers be widened beyond 100 feet</u>. Current width is subject to blow down (nearly 30% lost) and do not provide ecosystem services.</li> <li>• Given recent research on effects of thinning on browse and shrub production in managed stands the design of buffers, and Standards &amp; Guidelines applicable to their management should be reviewed. Standards &amp; Guidelines affecting their management should evolve from a general strategy of retention of existing conditions within an arbitrary distance to active management that achieves identified management goals on a site specific basis.</li> <li>• Management of stream buffers to provide adequate recruitment of large woody debris important for pool and riffle development, thinning existing young growth stands to improve important deer habitat along coastlines and streams, and establishment of advance regeneration within stream buffers to provide a future source of LWD should be taken into consideration.</li> </ul>

AQUA 2-H	<p><u>Water yield</u> is not adequately addressed by the Tongass. Water yield (that is, how water moves across the landscape, flow quantity, velocity, seasonality) should be incorporated into monitoring and timber sale analyses to better evaluate how it is changing in managed watersheds, especially in relationship to climate change. The Tongass should manage the uplands landscape to secure favorable conditions of water flow.</p> <p>Similar themes are found in SOCs: AQUA 2-H, MAN 1-G, MAN 7-E</p>
AQUA 2-I	<p>Concern that roads are being closed on the forest, with the rationale given by the USFS that it would be too expensive to fix fish passage (culvert) problems on those roads. Comments <u>object to the road closures</u>.</p>

### 4.3 CULTURAL AND HERITAGE (CULT)

Includes comments about Alaska Natives, Alaska Native values, cultural and heritage sites and management, sense of place, sacred sites, Tongass as a Native place and place for interaction with Alaska Native culture, tribal recognition, traditional ways, and place knowledge. Also includes comments about the perspective and considerations of heritage of European settlers.

#### 4.3.1 Comment Analysis

A total of 22 comments were submitted for this topic; this included comments from representatives of five organizations: Alaska Native Brotherhood Camp 70, Central Council Tlingit and Haida Indian Tribes of Alaska, Douglas Indian Association, Friends of Admiralty Island, the Organized Village of Kake and Sealaska Corporation. Other comments came from the Ketchikan public meeting and unaffiliated individuals. No comment on this topic came from form letters.

One-quarter of the 22 comments were about CULT 1, the need to eliminate the requirement for Alaska Natives to acquire Special Forest Products permits. The remainder of the SOCs for this topic had one to four comments each.

#### 4.3.2 Statements of Concern

CULT 1	<u>Eliminate need for Alaskan Natives to obtain Special Forest Products permits</u> because these types of uses have minimal impact on the Forest and the bureaucratic hardship is unwarranted. (same as TIM 8-B)
CULT 2	<u>Continuous communication between the Forest Service and IRA Tribes is needed regarding sacred sites.</u> Do not publish any sacred site maps.
CULT 3	<u>The Forest Service should formally recognize IRA Tribes and their traditional territories.</u> This provides a basis for the areas to be included in government to government communications. Similar themes are found in SOCs: CULT 3, CULT 8, MAN 3-S, MAN 6-F
CULT 4	<u>Increase funding for protection and monitoring of heritage, cultural, and sacred sites.</u> Desecration of heritage resources has been observed. The loss of the Tongass Ranger Vessel has reduced monitoring activity at sites. Remediate the years of human solid waste accumulation at the well-visited sites.
CULT 5	<u>Southeast Alaskans need reliable access to the foods we grew up on.</u> Consider needs of people who live here before big business.
CULT 6	<u>Comments regarding management of cedar used for cultural purposes:</u> <ul style="list-style-type: none"> <li>The Forest Service is requested to develop a plan with the Southeast tribes to enable maximum utilization by Tribes of cedar while the product is in a useable state.</li> </ul>

	<ul style="list-style-type: none"> <li>• <u>Notify nearby IRA Tribes and public if any cedar trees will be logged so that harvest of the cedar bark can occur (best in May-and June) before trees are cut down.</u> Also, enforce the set-aside of the Red Cedar stand near Kake for cultural purposes.</li> <li>• Thousands of acres of yellow and red cedar are dying because of the lack of sufficient snowpack. Allow Tribes to maximize the use of a cedar tree with minimal impact.</li> <li>• Enforce the set-aside of the Red Cedar stand near Kake for cultural purposes.</li> </ul> <p>Similar themes are found in SOCs: CULT 6, MAN 6-A, SUB 3-A, TIM 9-A</p>
CULT 7	<u>Recognize Tlingit culture as a rare and vulnerable value to emphasize and preserve.</u>
CULT 8	<u>Rename and co-name all geographical locations</u> within the Tongass National Forest with their original Tlingit, Haida, and Tsimshian names in the Forest Plan, maps, and all USFS Tongass publications.  Similar themes are found in SOCs: CULT 3, CULT 8, MAN 3-S, MAN 6-F
CULT 9	The Tongass Forest is the place where Alaskan Natives can pursue traditional activities.
CULT 10	Hugh Smith Lake is important for cultural and other reasons. How will the re-designation of Saxman to non-rural for federal subsistence purposes affect this?
CULT 11	Honor Theodore Roosevelt's Forest Service legacy in the Tongass.
CULT 12	Most wilderness and forests in US and Canada are now gone, post European settlement.
CULT 13	Protect the rights of First Nations people in the area.

## 4.4 CUMULATIVE EFFECTS (CUMUL)

Comments on cumulative effects on forest resources, or cumulative effects of multiple resources, or of other things that are happening and may have an effect, or of multiple landowners in the region. Note that comments about multiple use or effects of an action on multiple resources were coded to Socio-3.

### 4.4.1 Comment Analysis

A total of 11 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, Pioneer Alaskan Fisheries, Inc., Southeast Alaska Conservation Council, and Southeast Conference. Comments also came from the Juneau and Petersburg public meetings and unaffiliated individuals. No comments on this topic came from a form letter.

About a third of the comments related to the SOC CUMUL 1, which states that the cumulative total board feet that non-Forest Service landowners in Southeast Alaska can provide is not enough to provide economy of scale needed for competitive mills and industry, pointing to the critical role of timber supply from the Tongass. The remaining six SOCs received one to two comments each.

### 4.4.2 Statements of Concern

CUMUL 1	<u>The cumulative total board feet that non-Forest Service landowners in Southeast Alaska can provide is not enough to provide the economy of scale needed for competitive mills and industry. The Forest Service is thus critical in providing enough timber supply to have a viable Southeast Alaska timber industry.</u> The State manages less than 2% of timberland in Southeast Alaska with a maximum harvest of 12 MMBF/year and private-UAS-AMHT collectively can support less than 100 MMBF/year.
CUMUL 2	<u>The cumulative impact should be reviewed of timber sales and related increased roads, habitat losses and hunting pressure on Wrangell Island, or on Wrangell, Kuiu, Kupreanof, and Prince Wales Islands.</u>
CUMUL 3	The relationship of <u>water temperature and other water quality and ecological parameters to fish habitat productivity</u> is different on the Tongass than in other areas where logging occurs (e.g. lower 48 states). The Forest Plan must acknowledge these differences and incorporate these relationships into its management of habitat. Examples submitted include: <ul style="list-style-type: none"> <li>• 2-3 degrees Celsius water temperature can damage a run of salmon or their prey species as was shown on Kodiak.</li> <li>• Estuarine damage can have effects on osmoregulation of smolt.</li> <li>• River system velocity can scour out spawning areas during the tender egg</li> </ul>

	<p>stage before salmon eggs eye up removing year classes in a storm event.</p> <ul style="list-style-type: none"> <li>• The relationships of colder water slower growth of macro invertebrates, the detritus they feed on, and the fish that prey on them is not adequately recognized.</li> <li>• Upwelling of water from tiny tributaries during dry weather events can remove spawning areas.</li> <li>• Chemical, physical, and thermal pollution is cumulative.</li> </ul> <p>Similar themes are found in SOC AQUA 1-G.</p>
CUMUL 4	<p><u>Fish declines outside of Southeast Alaska are due to cumulative impact</u> of faulty politically-based land use planning, clear cut forest practices, lax fishing regulations, lax industrial waste disposal protocols, outdated NPDES permitting, outdated municipal sewage discharges, scanty riparian protections and coastal habitats, to name a few.</p>
CUMUL 5	<p><u>There are sometimes multiple EAs/EISs and projects in an area (e.g., electrical, roads). It is confusing to know if or how they relate.</u> Are the reviews or analyzes linked? They seem separate and confusing. Are the cumulative impacts to fish and wildlife of disparate actions considered?</p>
CUMUL 6	<p>Management must <u>consider effects to the entire intertwined ecosystem</u>; LUD map geographies are too narrow of a management technique.</p>
CUMUL 7	<p>The TNF can <u>take action now to prevent further damage from the cumulative impact</u> that timber harvest can cause, and, prevent the need for costly restoration.</p>

## 4.5 ENERGY – HYDROPOWER (ENER 1)

Comments about the need for, or location of, hydroelectric projects, or location of corridors for power lines and interties.

### 4.5.1 Comment Analysis

A total of 73 comments were submitted for this topic. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power, Alaska Miners Association, Alaska Native Brotherhood Camp 70, Alaska Power and Telephone, First Things First Alaska Foundation, Juneau Chamber of Commerce, Ketchikan Chamber of Commerce, Kootznoowoo, Inc., Ocean Renewable Power Company, Pacific Fishing, Inc., Renewable Energy Alaska Project, Sitka Economic Development Association, and the Southeast Alaska Power Agency. Comments were submitted by US Senator Lisa Murkowski, Alaska State Representative Cathy Munoz, and former Governor and former Senator Frank Murkowski. Comments also came from the State of Alaska, City and Borough of Juneau, Ketchikan Gateway Borough, City of Ketchikan, City and Borough of Sitka, and Municipality of Skagway; from the Haines and Petersburg public meetings; and from unaffiliated individuals. No comments on this topic came from a form letter.

Twenty percent of the comments addressed SOC ENER 1-A, which emphasized that access issues that were already difficult for hydroelectric project development became much worse with re-imposition of the Roadless Rule on the Tongass. The remaining comments were more evenly distributed, with the other 18 SOCs received from one to eight comments each.

### 4.5.2 Statements of Concern

ENER 1-A	<p><u>Already difficult access within the TNF was further impacted by the extension of the 2001 Roadless Rule, which will challenge or prevent Southeast electrical provider's (SEAPA, AP&amp;T, AEL&amp;P, KPU, others) from accessing and developing new facilities and will impede the ability to access existing facilities, including transmission lines, to provide core maintenance and also hinders the key work necessary to plan and develop future energy resources.</u></p> <ul style="list-style-type: none"><li>• The re-imposition of the Inventoried Roadless Area (IRA) rule (“Roadless Rule”) in the Tongass means that the physical and economic viability of renewable energy the projects listed in SOC ENER 3-C are now in question due to the difficulty of access, construction, and transmission of energy in IRAs. While the Judge's decision in 2011 re-imposing the Roadless Rule exempted about a dozen projects from facing the rule's development limitations (including the Whitman Lake, Blue Lake, Little Port Walter, Takatz, Schube Lake, Lake Shelokum, Cascade Creek and Soule River hydroelectric projects, and the Port Frederick tidal power project), the vast majority of such projects either fall inside IRA</li></ul>
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	<p>boundaries, or need transportation access across IRA lands to reduce construction costs for the projects or to reduce the cost of installing power transmission lines needed to market any electricity generated by them.</p>
ENER 1-B	<p><u>Include a Renewable Energy Resource Plan in the amendments to the 2008 Forest Plan to facilitate review and development of hydroelectric projects including access and transmission corridors in the TNF.</u> The current Forest Plan is excessively burdensome and inconsistent with regard to renewable energy development and maintenance. It is also <u>inconsistent with other federal rules that promote renewable energy and reduction of greenhouse gases (GHG).</u> Only one example of this policy is the aggressive goal of requiring federal facilities to include a 20% mix of renewable energy by 2020.</p> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS-LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>
ENER 1-C	<p><u>Energy transmission corridors (and access roads) must be included in the Forest Plan</u> to facilitate develop of inexpensive hydropower (and other renewables) in the region. The Forest Plan should include a Right-of-Way Plan for electricity and renewable, affordable energy.</p>
ENER 1-D	<p>When hydropower information and analysis is added to the Forest Plan, consider that there can be <u>potential conflicts between hydro and other uses of an area.</u> Things have changed since hydro reservations made in the 1930s and 1940s. Review which LUDS allow hydroelectric development and ensure appropriate Standards and Guidelines are in place. (For example, maybe Scenery Creek would be better as a Remote Recreation LUD, rather than a Scenic Viewshed. A hydro development LUD isn't appropriate there. A lot of conflict in the Petersburg community could have been avoided.)</p>
ENER 1-E	<p>Allow hydropower development and transmission lines in all LUDS.</p>
ENER 1-F	<p>Changes to the Forest Plan are needed to address the development potential for hydroelectric and other renewable energy in a pro-active manner. (also see ENER 3-A)</p>
ENER 1-G	<p><u>The cost of energy affects the quality of life for residents, influences economic development in communities, and shapes future opportunities for the whole economy.</u> Proposals for hydroelectric projects are steadily increasing in the Alaska Region as the high cost of electric power remains one of the most significant factors impeding economic growth in both Southcentral and Southeast Alaska.</p> <ul style="list-style-type: none"> <li>Hydroelectric power is Southeast Alaska's largest source of renewable energy but many communities are still served solely by diesel generation, which is far more expensive. There are no roads in or out of most Southeast communities and because of this remoteness the cost of using fossil fuels for power is astronomical. The cost of hydropower</li> </ul>

	<p>ranges from 9 cents to 11 cents per kilowatt hour, with diesel-generated power ranging from 48 cents to 60 cents per kilowatt hour. <u>Many of the rural communities have to pay high costs for diesel powered electricity and heating.</u> A larger proportion of the population is Alaska Native in rural Southeast communities and more affected by the high energy costs. The way the Forest Plan is written the heavy emphasis is on the larger communities.</p> <p>Similar themes are found in SOCs: ENER 1-G, ENER 2-A&amp;B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&amp;E, SOCIO 2-A, SOCIO 2-P, SUB 3-C</p>
ENER 1-H	<p>The TUS overlay LUD seems like a means to accommodate responsible hydroelectric projects but the Forest does not seem capable or willing to utilize that tool.</p>
ENER 1-I	<p>Managing the Tongass for multiple uses also means allowing and designating areas for mining and hydropower development. These areas should also be exempt from the Roadless Rule.</p> <p>Similar themes are found in SOCs: ENER 1-I, ENER 3-B, MAN 8-C, MINE 4, TIM 1-C, TIM 1-G, TIM 4-B, TIM 5-A</p>
ENER 1-J	<p>The Tongass National Forest is host to a large number of hydroelectric resources (see for example, the USFS 1947 Water Powers of Southeast Alaska Report, the draft Southeast Integrated Resources Plan (SEIRP). However, many lay in the <u>2008 Forest Plan's Avoidance LUDs where access is severely restricted, such as in the Remote Recreation LUD. Hydropower and other renewable energy projects are effectively precluded in TUS Avoidance LUDs. The Forest Plan must be amended to remedy this.</u></p> <ul style="list-style-type: none"> <li>• The USFS noted (to AP&amp;T) almost 4 years ago that a hydropower project sited in a Remote Recreation Transportation and Utility System (TUS) Avoidance Area could not meet the management direction for that LUD consistent with NEPA. The TNF Team determined that the TUS LUD cannot be applied to allow hydropower development in Remote Recreation LUDs, yet the TNF has not amended the Forest Plan as it acknowledged was needed.</li> </ul>
ENER 1-K	<p>The Forest Plan should refer to Public Law 106-511 enacted on November 13, 2000 that authorized federal funding for the <u>Southeast Alaska Intertie System.</u> Interties will have to cross IRAs to complete new segments. The Forest Plan should <u>identify the locations of all renewable energy projects potentially available for construction in the region and allow access routes for both construction and maintenance roads and transmission power lines to reach load centers.</u></p> <ul style="list-style-type: none"> <li>• Do this by creating a new Renewable Energy LUD covering renewable energy sites, or, revise regulations to govern the existing IRA Rule to</li> </ul>

	<p>provide firm opportunities for road and power line access to renewable energy sites.</p> <ul style="list-style-type: none"> <li>• <u>The original IRA rule, issued by Executive Order 12866 in 1993, certainly intended to permit access for road construction and utility corridors for all non-forestry projects.</u> The 1993 rule specifically recognized that the impact of the Rule could lead to lost business opportunities, which "may be more pronounced" in Alaska than nationwide - effects in Alaska likely increasing in the longer term.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-K, ENER 3-A, all LUD-NEW/ENER SOCs, MAN 7-A, MAN 8-A</p>
ENER 1-L	<p><u>Hydro projects are major construction projects that require heavy machinery and equipment and require roads for access.</u> The generators at Tyee, for example, weigh 30 tons. A hydropower project cannot be constructed with helicopters alone. <u>Because the 2001 Roadless Rule prohibits road construction as well as tree cutting, no new hydro projects will be built in Roadless areas.</u> <u>Roadless Rule re-imposition will prevent or severely constrain development of hydrokinetic energy in IRAs.</u></p>
ENER 1-M	<p><u>Experience shows that Alaskan hydropower projects can be built and operated with a minimum of impact.</u> The overlap of resource agency and FERC review helps ensure renewable energy projects are developed with an emphasis on environmental protection and public interest. Examples:</p> <ul style="list-style-type: none"> <li>• It is generally a narrow corridor and/or footprint and once in operation rarely has any future or new impacts.</li> <li>• In many cases only short roads are needed. If tunnels can be used to transport the water, environmental impacts are also significantly reduced.</li> <li>• Generally, these projects are not closely situated to each other, minimizing their collective impact as well.</li> <li>• These projects also offset their impacts to the forest by reducing greenhouse gases (GHG); providing more benefit than impact.</li> <li>• As with other resource development, impacts expected from a renewable energy project are investigated prior to construction/operation.</li> <li>• We know how to build hydroelectric projects while protecting fish runs.</li> </ul>
ENER 1-N	<p><u>Specific existing or proposed hydroelectric projects and related access roads/utilities called out in comments to incorporate into the Forest Plan and support are:</u></p> <ul style="list-style-type: none"> <li>• Lake Grace Hydropower, which has the potential to produce much needed hydropower to the southern southeast region of Alaska.</li> </ul>

	<ul style="list-style-type: none"> <li>• Hydroelectricity from Blue Lake, Takatz Lake, and other alpine lakes, which also requires access and utility corridors.</li> <li>• Pelican has a rich resource of hydroelectricity that could be shared with Hoonah.</li> <li>• Permit access for road links where needed in the region, such as the Bradfield Canal road to Canada, a road along a corridor to permit a high voltage electric transmission line to connect with the British Columbia system.</li> <li>• A road to permit lower-cost power transmission between Kake and Petersburg.</li> <li>• A road to permit cheaper construction of a power line to access Soule River (Hyder) hydroelectric development.</li> <li>• Facilitate the development of adequate and reliable sources of renewable energy for Sitka.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS-LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>
ENER 1-O	<p><u>Southeast Alaska has thousands of megawatts of documented, development-ready hydroelectric energy potential located within the Tongass National Forest. Energy production from hydropower should be encouraged.</u> Access to potential hydropower energy sites is needed. Without active management, these domestic renewable energy resources may inadvertently be made unavailable to communities in Southeast Alaska, the US, and the world.</p> <p>Similar themes are found in SOCs: ENER 3-C, LUD-NEW/ENERGY 1</p>
ENER 1-P	<p><u>Hydropower produces clean electricity.</u> We have so much potential. We should have more electric vehicles with so much closed road system and so much power available.</p>
ENER 1-Q	<p>It is local knowledge that there is <u>air quality pollution from cruise ships impacting the forest in Skagway.</u> The Municipality of Skagway is considering a new hydro project in part to allow cruise ships to connect to shoreside power to reduce air quality impacts. The Tongass isn't being managed correctly if these air quality threats are arising.</p>

## 4.6 ENERGY – BIOFUEL (ENER 2)

Comments about the need for or use of wood for biofuels, use of slash and wood for biofuels, management for biofuels, location of biofuel or pellet plant, volume of wood needed for biofuel or pellet plants.

### 4.6.1 Comment Analysis

A total of 11 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Power & Telephone, Central Council of the Tlingit and Haida Indian Tribes of Alaska, Pacific Fishing, Inc., Renewable Energy Alaska Project, and Sitka Economic Development Association.

Comments also came from the City and Borough of Juneau, Organized Village of Kake, City of Ketchikan, and Ketchikan Gateway Borough. No comments on this topic came from a form letter.

Over sixty percent of the comments addressed SOC ENER 2-C, which emphasized that the 2008 Forest Plan is silent on the use of forest resources for regional biomass energy, that this important energy source must be addressed in the plan and a new Land Use Designation. The remaining three SOCs received just one or two comments each.

### 4.6.2 Statements of Concern

Similar themes are found in SOCs: All ENER 2 SOCs, LUD NEW/ENER-8, MAN 6-E, MAN 7-C, MAN 8-A, SOCIO 2-O, TIM 1-D, TUS LUD-3

ENER 2-A	<p><u>Create partnerships among TNF, municipalities and Tribes to support use of the abundant biomass</u> available in Southeast Alaska. The high cost of heating fuel supports this need and pursuit of alternatives.</p> <p>Similar themes are found in SOCs: ENER 1-G, ENER 2-A&amp;B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&amp;E, SOCIO 2-A, SOCIO 2-P, SUB 3-C</p>
ENER 2-B	<p><u>The Southeast Integrated Resource Plan (SEIRP) favors biomass for heat and energy in Southeast; however, the TNF doesn't make biomass available at the levels necessary to achieve this or be sustainably profitable.</u> The SEIRP calls for 30% or more of the households in Southeast to switch to biomass heating over the coming decades to decrease local dependence on heating oil, and keep dollars in Alaska's economy. In the diesel electric communities in Southeast some households are paying nearly 50% of their take home pay for energy.</p>

ENER 2-C	<p><u>The Forest Plan is silent on the use of the forest resource for regional biomass energy, a critical energy source and commercial industry for the region. The Forest Plan should address and encourage energy production from biomass/wood. Include biomass as a use designated in the Land Use Designations.</u> Make forest resources available that can be used for bio-fuels, such as from commercial thinning, alder trees/shrubs, and other sources. How does the Forest Plan address use of downed timber for biomass/biodensification? Without active management, domestic renewable energy from biomass may inadvertently be made unavailable to communities in Southeast Alaska, the US, and the world.</p>
ENER 2-D	<p>Including appropriate biomass development for energy in the Forest Plan is consistent with President Obama's energy and climate policy.</p>

## **4.7 ENERGY – RENEWABLE ENERGY AND OTHER (ENER 3)**

Comments about any other energy related topics including tidal, geothermal or wind power that are not covered by what is above, and comments whose gist is about many renewable energy resources or renewable resources in general (including topics in ENER 1 and 2). This also includes comments about Renewable Energy Cluster, unless covered by ENER 1 or ENER 2. Note that comments asking for new Renewable Energy LUD are mostly coded to LUD-New/Energy.

### **4.7.1 Comment Analysis**

A total of 153 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power, Alaska Miners Association, Alaska Native Brotherhood Camp 70, Alaska Power & Telephone, Central Council of the Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, Juneau Chamber of Commerce, Ketchikan Chamber of Commerce, Kootznoowoo, Inc., Law Offices of James F. Clark, Organization Inc., Pacific Fishing, Inc., Prince of Wales Island Advisory Committee, Renewable Energy Alaska Project, Resource Development Council, Sitka Economic Development Association, Southeast Alaska Power Agency, and Southeast Conference.

Comments were submitted by US Senator Lisa Murkowski, Alaska State Representative Cathy Munoz, and former Governor and former Senator Frank Murkowski. Comments also came from the City of Craig, City and Borough of Juneau, Municipality of Skagway, City and Borough of Sitka, City of Ketchikan, Ketchikan Gateway Borough, City and Borough of Wrangell, the State of Alaska, University of Alaska, the US Forest Service, and from unaffiliated individuals. No comments on this topic came from a form letter.

Approximately 12-15% of the comments went to each of two SOCs. These are ENER 3-A, which calls for development of a renewable energy resource plan as a component of the forest plan, and ENER 3-X, which calls for 30-day turnaround for issuance of USFS Special Use Permits for projects with FERC preliminary permits. About 7-8% of the comments were addressed to each of four SOCs. These are ENER 3-B, citing concerns about the Roadless Rule impeding access to renewable energy; ENER 3-C, which lists proven renewable energy opportunities on the Tongass; ENER 3-L, which urges new rulemaking to again exempt the Tongass from the Roadless Rule; and ENER 3-W, which asserts that neither the Roadless Rule nor the 2008 Forest Plan analyzed the adverse economic and social costs of restricted access on the region's communities. The remaining 19 SOCs received from one to eight comments each.

#### 4.7.2 Statements of Concern

<p>ENER 3-A</p>	<p><u>The 2008 Forest Plan failed to address renewable energy or include a renewable energy resource plan. Please assure the Tongass Forest’s renewable energy resources are readily accessible by including a Renewable Energy Plan and Renewable Energy LUD within the Tongass Land Management Plan.</u></p> <ul style="list-style-type: none"> <li>• The Forest Plan failed to recognize pre-existing power site classifications and other potential renewable energy resources such as hydropower, geothermal, wind, tidal, wave, and other renewable energy sites. The current Forest Plan failed to consider the economic benefit, or the job opportunities related to the development of renewable energy, as did the 2001 Roadless Rule.</li> <li>• A Forest Plan amendment is needed to support streamlined, consistent, development of renewable energy resources and allow the required access and utility corridors</li> </ul> <p><u>Existing Federal policies and administrative directives all support inclusion of a Renewable Energy Plan and Renewable Energy LUD in the Forest Plan,</u> including those on national energy, that federal facilities are to use 20% renewable energy, about national energy security, and greenhouse gas emission reduction. Development of renewable resources in the Tongass would help the US realize its goals of increasing domestic energy production through renewable sources, and reducing emissions and greenhouse gasses, all consistent with the energy and climate policies announced by Obama.</p> <ul style="list-style-type: none"> <li>○ References cited and quoted in individual comments are from: 1. EO 13423; 2. EPA Act of 2005; 3. Energy Independence and Security Act of 2007 (EISA, 42 USCA 170001 et. seq.; 4. Comments detailing ways that the EO 12866 review of the 2001 Roadless Rule failed to include the adverse impacts and costs of application of the Rule to renewable energy development projects and transmission lines in the TNF, and failed to include several lost opportunity costs.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-K, ENER 3-A, all LUD-NEW/ENER SOCs, MAN 7-A, MAN 8-A</p>
<p>ENER 3-B</p>	<p><u>The region, communities, businesses, and residents are harmed by the inability to construct the roads and transmission lines necessary to develop potential renewable energy sites and to distribute such power as a consequence of the reinstatement of the 2001 Roadless Rule.</u></p> <ul style="list-style-type: none"> <li>• The re-imposition of the 2001 Roadless Rule to the Tongass National Forest in March 2011 withdrew geothermal energy from the plan, made hydropower and transmission-line construction difficult, erected barriers to mineral exploration and mine development, and hindered the execution of a timber management strategy that had been adopted in the Forest Service's record of decision. This covers 9.6 million acres of IRA.</li> <li>• The final 2001 Roadless Rule retains all of the provisions that recognize</li> </ul>

	<p>existing rights of access and use. Where access to these facilities is needed to ensure safe operation, a utility company may pursue necessary authorizations pursuant to the terms of the <u>existing</u> permit or contract. However, because there is no mention of new utilities, or any mention of hydropower, the 2001 Roadless Rule does not allow <u>new</u> roads for such development.</p> <ul style="list-style-type: none"> <li>• Restore multiple use management in the forest and provide new economic opportunities for local communities and residents.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-I, ENER 3-B, MAN 8-C, MINE 4, TIM 1-C, TIM 1-G, TIM 4-B, TIM 5-A</p>
ENER 3-C	<p><u>The Tongass National Forest is host to a large number of proven hydroelectric, wind, tidal, and geothermal resources.</u></p> <ul style="list-style-type: none"> <li>• The region has thousands of megawatts of potential hydroelectric, geothermal, biomass, tidal, wave, wind and solar renewable resources. Already there are more than 45 projects, offering 450 megawatts of electricity, on the drawing boards in the region, on top of the 33 hydro projects currently supplying about 200 megawatts of power to the region already built. <ul style="list-style-type: none"> <li>○ See for example, the USFS 1947 Water Powers of Southeast Alaska Report, the draft Southeast Integrated Resources Plan (SEIRP), and the Alaska Energy Authority’s list of renewable energy projects in Southeast Alaska.</li> </ul> </li> <li>• These resources can be developed in a manner that can help provide renewable energy to Alaskans, as well as to other parts of the US through transmission connections through Canada. Development of these resources would help the US realize its goals of increasing domestic energy production through renewable sources, and reducing emissions and greenhouse gasses. Without active management, these domestic renewable energy resources may inadvertently be made unavailable to Southeast Alaska, the US, and the world. This stifles renewable energy development so that rather than be a part of the US energy future the TNF ignores our country’s energy future and the significant role the TNF could play.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-O, LUD-NEW/ENERGY-1</p>
ENER 3-D	<p>Following construction of Renewable Energy Resource projects, lands that are permanently cleared for such projects will <u>be considered unsuitable for timber production.</u></p>
ENER 3-E	<p><u>The development of renewable energy resources by providing a low-carbon energy alternative would avoid emitting millions of metric tons of carbon emissions into the atmosphere.</u> A Renewable Energy Plan and Development</p>

	<p>would allow not only mines, but entire communities in Southeast Alaska to significantly decrease the greenhouse gas (GHG) and other emissions in the TNF, reduce the need for shipment and potential spills of diesel and operate these communities' economies and mines at a lower cost than diesel. Moreover, it would avoid the need for some, expensive air control devices. The Tongass has significant renewable energy resources that once developed could displace the use of fossil fuel, which is believed to warming the climate of earth.</p> <p>Similar themes are found in SOCs: ECO 1-A, ENER 3-E, ENER 3-W, MAN 8-E, RR-21, SCIENCE-B, TIM 9-I, MAN 7-B</p>
ENER 3-F	<p>The 9.6 million acres of IRA and 5.6 million acres of Wilderness in the TNF make it highly probable that <u>hydropower and other renewable energy projects needed to lower energy costs will be prohibited or made very difficult</u> to access and develop.</p>
ENER 3-G	<p><u>Corridors</u> (and access) for existing and future energy transmission lines, mining activities, utilities, roads and associated infrastructure need to be protected. It is critical to recognize the importance of energy transmission/utility connections between Southeast communities. This includes a remedy for the TUS Avoidance LUDs essentially prohibiting hydroelectric power and corridor development. New technologies can be used to minimize the impacts to the environment and to lay utility corridors to communities in need of affordable power.</p> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS-LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>
ENER 3-H	<p><u>Energy production from geothermal should be encouraged.</u> Without active management, this domestic renewable energy resource may inadvertently be made unavailable to communities in Southeast Alaska, the US, and the world.</p>
ENER 3-I	<p><u>The Roadless Rule allows access to locatable minerals, but denies access to new leases for minerals subject to the Mineral Leasing Act of 1920, which include geothermal resources.</u> By specifically prohibiting road construction within IRAs to access new Mineral Leases the Roadless Rule prevents the development of geothermal resources, which are covered by the Mineral Leasing Act of 1920. This is inconsistent with the policy underlying EISA § 17286. There is no explanation in the 2001 Final Roadless Rule and ROD why the access impacts to IRAs associated with locatable minerals is different from the access impacts to IRAs associated with leasable minerals.</p>
ENER 3-J	<p><u>There are numerous geothermal sites in the Tongass that have the potential to generate renewable electric power.</u> For example, there is a large geothermal site in Upper Tenakee Inlet that could serve Tenakee, Hoonah and Pelican. Yet, it is unavailable because the 2008 Amended Forest Plan lacks a renewable energy plan and because of application of the 2001 Roadless Rule to the TNF.</p>

ENER 3-K	The Forest Service has opposed construction access for a <u>Bell Island geothermal project</u> , even though such a plant would be located within a few miles of the existing Southeast power intertie.
ENER 3-L	Consistent with its 2003 Settlement Agreement with the State of Alaska, the Forest Service should <u>immediately engage in rulemaking to once again exempt the TNF from the 2001 Roadless Rule, which among other things, would again authorize geothermal leasing on the TNF.</u>
ENER 3-M	If the development of Renewable Energy Resources changes the Recreation Opportunity System (ROS) setting, <u>manage recreation and tourism in accordance with the new setting.</u> Consider development of recreation and tourism facilities in conjunction with the planning of state or federal highways, and Renewable Energy Resource projects. Similar themes are found in SOCs: ENER 3-M, MAN 5-C, REC-1, REC-6, TOUR 1-D, TOUR 1-H, TOUR 3-B, TRANS 4-C
ENER 3-N	<u>USFS land use policy in the Tongass should include efforts to assist the smaller communities in lowering the cost of electricity and thereby create jobs and promote economic competitiveness in these places with high unemployment.</u> <ul style="list-style-type: none"><li>The five largest communities in the region enjoy relatively low rates for electricity. The balance of the population in Southeast Alaska pays much higher rates. A balance of interests should be crafted that protects the existence of smaller communities in the Tongass.</li></ul> Similar themes are found in SOCs: ENER 1-G, ENER 2-A&B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&E, SOCIO 2-A, SOCIO 2-P, SUB 3-C
ENER 3-O	With the increasing prices of diesel, <u>renewable energy projects present an opportunity to provide lower cost energy to support the industries and economy in Southeast Alaska.</u> To achieve this: 1. provide a clear path to obtain Special Use Permits within the TNF, 2. provide appropriate LUDs for renewable energy projects, and 3. speed review of applications, including preliminary permits for hydroelectric sites. All will aid in the long-term development of clean energy resources.
ENER 3-P	The USFS should develop and <u>incorporate specific goals and objectives</u> (Chapter 2, Forest Plan) <u>for managing renewable energy resources</u> on the TNF. The Plan has to change to place more emphasis on managing for hydropower and bio-fuels while maintaining conservation safeguards for habitat.
ENER 3-Q	<u>Forest Plan needs to reference and use information in several missing State and Federal Acts, laws and MOUs.</u> It fails to address the combined significance of these documents and their impacts on Tongass renewable energy development.. <ul style="list-style-type: none"><li>References cited and quoted in individual comments are from: 1. SAFETEA-LU corridors (Public Law 109- 59, Sections 4407; 2. Map 92337 dated June 15, 2005; 3. Memorandum of Understanding between the</li></ul>

	<p>USFS and State of Alaska; 4. State’s Southeast Alaska Transportation Plan; 5. Public Law 109-59 and supporting documents are not identified and recognized; 6. Public Law 106-511 enacted on November 13, 2000, which established the Southeast Alaska Intertie System is missing.</p> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS–LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>
ENER 3-R	<p>Does Forest Plan have <u>flexibility to address future community infrastructure needs</u> such as new water, electrical, and other infrastructure that might develop before the next plan revision?</p>
ENER 3-S	<p><u>Mining in Southeast Alaska would be greatly advantaged by the availability of renewable energy to offset the high cost of diesel for mines operations in rural areas.</u> Note that back-up diesel back up will be required, and is a capital cost, even where hydroelectric power is available. But, renewable energy, especially hydropower, can significantly reduce mining’s operating costs. The Greens Creek Mine is greatly advantaged by the availability of hydropower from AEL&amp;P. The Kensington Mine would benefit if low cost, renewable energy were available to it. The projects being developed on Prince of Wales Island (Niblack and Bokan Mountain) are good examples of mines that could benefit from renewable energy. It follows that the proposed Renewable Energy Resource LUD should be added to the Forest Plan to reduce the cost of power and to provide mining and other jobs in rural Southeast Alaska.</p> <p>Similar themes are found in SOCs: ENER 1-G, ENER 2-A&amp;B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&amp;E, SOCIO 2-A, SOCIO 2-P, SUB 3-C</p>
ENER 3-T	<p><u>Do not support the potential “road corridor” and “power transmission line” running through Baranof Warm Springs and Baranof Lake area on Baranof Island.</u> This corridor is controversial because it is through an extremely scenic area that experiences very high recreational visitation.</p> <ul style="list-style-type: none"> <li>• Pushing either a road or a transmission corridor through here would be expensive and destructive. Mountain tunnels, difficult to build and expensive to maintain, would be necessary. The extensive hot springs at Baranof Warm Springs would be threatened by blasting.</li> </ul> <p>Similar themes are found in SOCs: ENER 3-T, REC-8, TRANS 3-I</p>
ENER 3-U	<p><u>Many want a national forest policy that provides a balance between development and conservation.</u> The regional, non-profit Southeast Conference, for example, has prepared detailed, individual memoranda on <u>renewable energy</u>, mining, and an alternative conservation plan that includes timber development. To see these documents, go to <a href="http://www.seconference.org">www.seconference.org</a>.</p>

ENER 3-V	Consider use of <u>solar powered panels</u> to remediate human waste left from beach camping or culture camp visits. Particularly in areas with years of human waste, from logging and weekend expeditions.
ENER 3-W	<p>Neither the 2001 Roadless Rule nor the 2008 Amended Forest Plan <u>considered or analyzed the adverse economic costs, or the opportunity costs for jobs related to the development of renewable energy resources, to rural Southeast Alaska communities, or the direct economic impact on Southeast Alaska residents caused by their inability to access and develop renewable energy resources in rural Southeast Alaska.</u></p> <ul style="list-style-type: none"> <li>• <u>There is a need to be able to develop renewable energy in the Tongass to benefit the region’s communities, businesses and residents, many of whom are saddled with extraordinarily high energy costs.</u></li> <li>• There is deep concern about the negative impacts of the current Forest Plan on rural communities in Southeast Alaska. A Renewable Energy Plan is needed to reduce the consumption of high cost fossil fuels for the benefit of human health, economic development, the environment and national security, in the 32 communities of Southeast Alaska. Southeast Alaskans who live, work and recreate in the Alaska communities within the TNF will be harmed by the inability to develop renewable energy resources to provide potentially less expensive, non-carbon power for development projects in the region.</li> <li>• The health, vitality, strength, and future of our region relies upon reasonable cost, environmentally sound, renewable energy. Renewable energy development in the TNF is the wave of the future and the Forest Service has the responsibility to map a process by which communities, utilities, and private corporations can develop these renewable resources for the public good.</li> </ul> <p>Similar themes are found in SOCs: ECO 1-A, ENER 1-G, ENER 2-A&amp;B, ENER 3-E, ENER 3-N, ENER 3-S, ENER 3-W, LUD NEW/ENER-7, MAN 8-E, RR-21, SCIENCE-B, SOCIO 1-D&amp;E, , SOCIO 2-A, SOCIO 2-P, SUB 3-C, TIM 9-I, MAN 7-B</p>
ENER 3-X	<p><u>Reasonable access should be defined as a 30-day turnaround for issuance of USFS Special Use Permits for those with mining claims or FERC preliminary permits</u> in order to authorize investigations and develop lawfully permitted federal resources. Given the short Southeast Alaska construction season and the numerous fishery closure periods, timely permit approval is vital.</p> <ul style="list-style-type: none"> <li>• This is in keeping with several federal Executive Orders and laws to increase communication, coordination and expedite permitting for renewable energy projects that decrease dependence on foreign oil, or for infrastructure projects.</li> </ul>

	<ul style="list-style-type: none"> <li>○ References cited and quoted in individual comments are from: 1. Executive Order (EO) 13580 (July 12, 2011) regarding an Interagency Working Group on Coordination of Domestic Energy Development and Permitting in Alaska; 2. EO 13604 (March 22, 2012) - Improving Performance of Federal Permitting and Review of Infrastructure Projects; and 3. EO 1356376 Fed. Reg. 3821 (January 18, 2011). Improving Regulation and Regulatory Review.</li> <li>● <u>To facilitate the award of permits, the Chief of the Forest Service and the Secretary of Agriculture should re-delegate to the Forest Supervisor and District Rangers the ability and authority to approve permitting decisions within roadless areas.</u> Since 2009 when that authority was consolidated in Washington, DC, there have been a number of incidences where permit approval delays have threatened to cause activities to miss entire construction seasons, from ore exploration drilling permits at the Greens Creek mine near Juneau to routine telecommunication tower maintenance permit approvals throughout forests in Alaska.</li> </ul> <p>Similar themes are found in SOCs: ENER 3-X, MAN 2-B MAN 2-H, MAN 2-K, MAN 4-E, MAN 8-B, MINE 3, MISC-EDIT 7, RR-15, RR-16</p>
ENER 3-Y	<p><u>Other resource uses and activities do not conflict with Renewable Energy Resource project operations.</u> Renewable Energy projects have been constructed in an efficient, economic, and orderly manner, and have been designed to be compatible with the adjacent LUD to the maximum extent feasible. The minimum land area consistent with an efficient, safe, economic, and maintainable Renewable Energy Resource project has been used for their development. Effects on other resources have been recognized and resource protection has been provided.</p>

## 4.8 FISHERIES ENHANCEMENT (FISH 1)

Comments about fish enhancement including hatcheries, net pens, and stocking lakes or streams with hatchery fish.

### 4.8.1 Comment Analysis

A total of 16 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Southeast Alaska Fishermen's Alliance, Southern Southeast Aquaculture Association (SSRAA), United Fishermen of Alaska, and United Southeast Alaska Gillnetters. Comments were also submitted by the City of Ketchikan and Ketchikan Gateway Borough, and from the Ketchikan public meetings and from unaffiliated individuals. No comments on this topic came from a form letter.

About a third of the comments addressed SOC FISH 1-A, which requests that the forest plan recognize the Legislative intent in ANILCA to allow hatcheries and supplementation such as remote release sites in LUD II and in wilderness areas. Another third addressed FISH 1-C, which expressed support for SSRAA's use of Connell Lake for coho salmon enhancement. The remaining SOCs received one to two comments each.

### 4.8.2 Statements of Concern

FISH 1-A	<p>The Forest Plan must recognize that the Legislative intent in ANILCA was to <u>allow hatcheries and supplementation such as remote release sites in LUD II and in wilderness areas.</u></p> <ul style="list-style-type: none"><li>• The Tongass currently has a narrow interpretation that enhancement improvements in these land designations would be "temporary in nature" and limited to actions such as fish passageways, ladders and rehabilitative stream work. The plan's Wilderness Goals and Objectives should include an additional goal that reflects ANILCA's statement about enhancement: "...the Secretary of Agriculture may permit fishery research, management, enhancement, and rehabilitation activities within national forest wilderness and national forest wilderness study areas designated by this Act. Subject to reasonable regulations permanent improvements and facilities such as fishways, fish weirs, fish ladders, fish hatcheries, spawning channels, stream clearance, egg planting, and other accepted means of maintaining, enhancing, and rehabilitating fish stocks may be permitted by the Secretary to achieve this objective." Enhancement projects should be given a fair and public process for consideration of its value, particularly in light of the benefits of enhancement to the region.</li></ul> <ul style="list-style-type: none"><li>○ See ANILCA Title 13, Section 1315; TTRA Section 201 LUD II Management Areas; TLMP management criteria for LUD II areas (1979, 1985-86).</li></ul>
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	Similar themes are found in SOCs: FISH 1-A&B, FISH 2-A&B, FISH 3-A&B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K
FISH 1-B	Update the <u>inventory of forest streams and watersheds that would be suitable for fish enhancement</u> . This information would assist aquaculture operators in planning for expanded operations.
FISH 1-C	<p><u>Support for Southern Southeast Regional Aquaculture Association's (SSRAA) use of Connell Lake for coho salmon enhancement</u>. This would require modification of the current Recreation LUD designation for this area.</p> <p>Arguments in support include:</p> <ul style="list-style-type: none"> <li>• Lake is on road system, which makes it economically viable enhancement project</li> <li>• SSRAA is a private non-profit entity, not a commercial enterprise (fish become common property, not sold)</li> <li>• SSRAA needs this location to expand operations</li> <li>• the project and produced fish would have recreation and education value</li> <li>• Connell Lake used to be a coho system and this enhancement activity would restore salmon run</li> </ul>
FISH 1-D	<u>To protect the contributions of the Neets Bay Hatchery</u> , contact SSRAA for preferred buffer zones around Bluff Lake, Neets Lake and Neets Creek when taking management actions that affect these water bodies. The water from these three systems feeds this hatchery.
FISH 1-E	Provide a <u>definition of "enhancement"</u> of fishery resources in Glossary 7 that is consistent with the State of Alaska's definition.

## 4.9 FISHING- MARICULTURE (FISH 2)

Comments about mariculture, including upland support.

### 4.9.1 Comment Analysis

A total of six comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Blue Starr Oyster Company and Tomaso Shellfish. Comments were also presented at the Ketchikan public meetings and from unaffiliated individuals. No comments on this topic came from a form letter.

Two-thirds of the comments addressed SOC FISH 2-A, which requests that the forest plan provide upland access necessary for mariculture operations. One-third addressed FISH 2-B, which requested the forest plan give more recognition to mariculture and its potential contribution to economic development in Southeast Alaska.

### 4.9.2 Statements of Concern

FISH 2-A	<p>The Forest Plan needs to provide the <u>upland access necessary for mariculture</u> operations. Upland access is needed to make mariculture sites economical and sustainable.</p> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>
FISH 2-B	<p>The Forest Plan needs to give <u>more recognition to mariculture</u> and its potential contribution to economic development in Southeast Alaska.</p>

## 4.10 FISHING – OTHER (NOT FISH HABITAT) (FISH 3)

Comments about other commercial or sport fishing related, NOT including salmon/fish habitat which go to AQUA 1.

### 4.10.1 Comment Analysis

A total of 16 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Cascadia Wildlands, Pioneer Alaskan Fisheries, Inc., Responsible Cruising in Alaska, Sitka Conservation Council, Southeast Alaska Conservation Council, and Trout Unlimited. Comments were also presented at the Ketchikan and Petersburg public meetings and from unaffiliated individuals. Two comments on this topic came from a form letter.

Nearly two-thirds of the comments addressed SOC FISH 3-A, which requests that the forest plan emphasize fish production and support for the fishing sector in Southeast Alaska, with greater recognition of the economic value of fisheries to the region. The other SOCs received three comments each.

### 4.10.2 Statements of Concern

FISH 3-A	<p>Tongass management should <u>emphasize fish production and support for the fishing sector</u> and more fully and accurately recognize the economic value of commercial, sport and subsistence fisheries to the region and its communities. Salmon fisheries are the most important economic engine in the SE Alaska economy, are largely supported by salmon produced on the Tongass, support Alaska fishing and value-added businesses, and are sustainable.</p> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>
FISH 3-B	<p>Specific <u>management recommendations to emphasize fishery production</u> include:</p> <ul style="list-style-type: none"> <li>• Redirect resources from timber sales to projects that promote fishing industry</li> <li>• Manage as a US National Fishery Reserve and prohibit all commercial timber harvest</li> <li>• Allow only selective timber harvest, such as for music wood</li> </ul>
FISH 3-C	<p>The Forest Plan should <u>reinsert the list of fish stocks on the forest</u>, which was in a previous version of the plan. Marx Creek chum salmon run in Hyder and the eulachon run on Carroll Creek should be included in the list of fish stocks on the forest.</p> <p>Similar themes are found in SOC MAN 7-F.</p>

## 4.11 GENERAL ECOLOGICAL - FOREST (ECO 1)

Comments regarding the enduring value of, or need for protection of, old growth forests, public forest land, or national forests generally. (Note that more specific comments about timber management would be found under TIM.)

### 4.11.1 Comment Analysis

A total of 176 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Audubon Society, Alaska Wilderness League, Latitude Adventures LLC, and the Pioneer Alaskan Fisheries, Inc. Comments were also submitted by the Port Protection Community Association and presented at the Haines and Petersburg public meetings, and received from unaffiliated individuals. One hundred and thirty seven (137) of the comments on this topic came from form letters that had an additional unique substantive comment.

In addition to the form letters with unique comment that were included in the counts of commenters noted above, an additional 131,916 signatures/comments from six form letter campaigns were submitted on Statement of Concern ECO 1-A. See the Submission Index on the last page of this document for more information.

### 4.11.2 Statements of Concern

ECO 1-A	<p>General statements of <u>support for protection of old growth forests and public forest lands</u> for the values they support, including comment that the Tongass has the largest remaining tracts of temperate rainforest in the world. Comments speak about the importance of old growth forests to:</p> <ul style="list-style-type: none"><li>• fish and wildlife (including rare and sensitive species),</li><li>• future generations of humans,</li><li>• ecological diversity,</li><li>• carbon absorption and resilience to climate change,</li><li>• support for other sustainable industries (fisheries, tourism, recreation) and subsistence,</li><li>• provide potential future use medical treatments, and</li><li>• provide wilderness and legacy values.</li></ul> <p>Some comments refer to the Tongass the "crown jewel" of the National Forest System and note that it represents one-third of the world's temperate rainforest.</p> <p>Similar themes regarding carbon absorption or banking are found in SOCs: ENER 3-E, ENER 3-W, MAN 8-E, RR-21, SCIENCE-B, TIM 9-I, MAN 7-B</p>
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## 4.12 GENERAL ECOLOGICAL- ECOSYSTEMS (ECO 2)

Comments regarding the enduring value of, or need for protection of, the intact environment or ecosystems on the Tongass National Forest. (Note that more specific comments about ecosystem protection are found in other sections, such as AQUA, TERR, WCS.)

### 4.12.1 Comment Analysis

A total of 48 comments were submitted for this topic. This included comments from representatives of the following entities: Alaska Wilderness League, Pioneer Alaskan Fisheries, Inc., and Trout Unlimited. Comments were also submitted by the US Fish and Wildlife Service, and presented at the Juneau public meeting and from unaffiliated individuals. Thirty-three (33) of the comments on this topic came from form letters.

### 4.12.2 Statements of Concern

ECO 2-A	General statements in <u>support of protection of Tongass Forest ecosystems</u> (not as specific to old growth or forest protection, as in ECO 1-A). Comments note the value of the Tongass' salmon productivity, wildlife, natural beauty, value for tourism and recreation, sustainable activities that support local communities, importance related to resilience for climate change, and its general value to the American public and legacy for future generations.
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## 4.13 MINING (MINE)

Includes comments related to mining, mineral exploration, and development of mines.

### 4.13.1 Comment Analysis

A total of 69 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Electric Light and Power, Alaska Miners Association, Alaska Native Brotherhood, Alaska Power & Telephone, Central Council of the Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, Friends of Admiralty Island, Juneau Chamber of Commerce, Kootznoowoo, Inc., Law Office of James F. Clark, Organization Inc., Prince of Wales Community Advisory Council, Resource Development Council, Southeast Conference, Sitka Economic Development Association, Southeast Alaska Power, University of Alaska Southeast. Comments were submitted by US Senator Lisa Murkowski, Alaska State Representative Cathy Munoz, and former Governor and former Senator Frank Murkowski. Comments were also submitted by the City and Borough of Juneau, City and Borough of Wrangell, City of Craig, and the State of Alaska. Comments were presented at the Ketchikan public meeting and from unaffiliated individuals. No comments on this topic came from form letters.

Each of the following SOCs received about 20% of the comments: MINE 1, requesting reasonable access to mines and mining development in the Tongass; MINE 2, expressing concern that the re-imposition of the 2001 Roadless Rule to the Tongass created barriers to mineral exploration and development and to use of renewable energy at mines; MINE 3, requesting that special use permits for mines be streamlined to 30 days; and MINE 4, asking the Tongass to allow for mining development such that the region can benefit from this economic sector. The other six SOCs received from one to six comments each.

### 4.13.2 Statements of Concern

MINE 1	<p><u>There should be mines and mining development in the Tongass, which will be complicated and hindered by the IRA and Roadless Rule.</u></p> <ul style="list-style-type: none"><li>• <u>The Roadless Rule creates several problems for mineral exploration and access to and development of mines:</u><ul style="list-style-type: none"><li>○ While “reasonable access” to locatable minerals is technically authorized in Wilderness and IRAs under 36 CFR Part 228, there are very few mines in Wilderness Areas. Even though the 2001 Roadless Rule specifies: “Reasonable rights of access may include, but are not limited to, road construction and reconstruction, helicopters, or other non-motorized access” (FEIS Vol. 1, 3-329 to 3-350), the experience of the Southeast Alaska mining community is that Special Use Permits authorizing road access in or near Wilderness Areas are very difficult to obtain.</li><li>○ While the 2001 Roadless Rule allows “reasonable access” to locatable minerals, it denies access to new leases for minerals subject to the Mineral Leasing Act of 1920, “because of the potentially significant environmental impacts that road construction</li></ul></li></ul>
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could cause to IRAs.” There is no explanation in the 2001 Final Roadless Rule and Record of Decision (ROD) why the access impacts to IRAs associated with locatable minerals is different from the access impacts to IRAs associated with leasable minerals.

- Mining exploration requires the drilling of multiple holes to determine from the surface the subsurface characteristics and extent of the mineral resource. Mine development requires site clearing for buildings, tailings piles, mills, and other facilities. The needed level of exploration to develop a mine on the Tongass National Forest would typically require the substantial cutting of trees. Mine development would typically require even significantly more cutting of trees. While “reasonable access” is technically permitted in IRAs, cutting trees associated with mining exploration and development does not appear to be allowed. 36 CFR § 294.13 (b) (2) authorizes the cutting of timber “incidental to implementation of a management activity not otherwise prohibited by this subpart.” However, there is no mention of mining in the examples provided in the 2001 Rule and ROD of what this section authorizes. Moreover, in describing this section the Rule and ROD states “Such management activities are expected to be rare and to focus on small diameter trees.” If these are the standards meant to define “reasonable access” then many reasonable uses proposed in IRAs will fail the standard.
- The January 2001 regulations (Section 294.12 (b)(7)) permits roads to be built across inventoried roadless areas if needed “in conjunction with the continuation, extension or renewal of a mineral lease on lands that are under lease by the Secretary of the Interior. Such road construction or reconstruction must be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or reasonable surface disturbance and complies with all applicable lease requirements.” But the rule, as it has been implemented, irrationally denies access to mineral developments.
- The rule says “Reasonable rights of access may include, but are not limited to, road construction and reconstruction, or other non-motorized access,” (FEIS Vol. 1,3-329 to 3-350.) But Administration-Forest Service policy clearly ignored such tenets in opposing a road through an IRA to reach either the Niblack or Bokan Mountain gold/Rare Earth Element mines proposed on the southeast side of Prince of Wales Island.
- The Forest Service have made it clear to Forest Service officials in authority on the TNF that, notwithstanding the 9.6 million acres of IRAs and 5.6 million acres of Wilderness that surround nearly every potential project within the TNF, authorization for reasonable access for mineral exploration, development and operation within IRAs will be restricted, if not prohibited altogether.

Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE 2, RR-1, R-19, SOC 2-F, TRANS 4-A

<p>MINE 2</p>	<p><u>The re-imposition of the 2001 Roadless Rule to the Tongass National Forest in March 2011 erected barriers to mineral exploration and mine development, and limited access of mines to renewable energy resources.</u> Application of the Roadless Rule has severely restricted access to mineral resources and the ability to prospect, explore for, and develop new mines in the Tongass. This negatively impacts the regional economy.</p> <ul style="list-style-type: none"> <li>• The Roadless Rule has prevented two large-scale mines from advancing their development to the production stage and thus slowing the economic stabilization in our region.</li> <li>• The economic interest of Prince of Wales is specifically impacted, as the Roadless Rule prohibits communities such as Craig and Klawock from accessing mines with a road on Prince of Wales Island, thereby denying access to jobs to the residents of those communities and a local workforce to Prince of Wales' mine projects, such as Niblack and Bokan Mountain.</li> <li>• By specifically prohibiting road construction within IRAs to access new Mineral Leases the Roadless Rule prevents the development of resources covered by the Mineral Leasing Act of 1920. This is inconsistent with the policy underlying EISA § 17286.</li> </ul> <p>Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE 2, RR-1, R-19, SOC 2-F, TRANS 4-A</p>
<p>MINE 3</p>	<p><u>The time it takes to process permits should be streamlined to include a 30 day turnaround for Special Use Permits.</u> For purposes of the Forest Plan the term "reasonable access" should be defined to provide timely (30 day turnaround) issuance of Forest Service Special Use Permits for those that hold a mining claim or a Federal Energy Regulatory Commission (FERC) preliminary permit to authorize these operations to investigate and develop lawfully permitted federal resources.</p> <ul style="list-style-type: none"> <li>• The Forest Service should comply with the Obama Administration's Executive Orders requiring federal agencies to speed up the permitting process. Executive Orders 13580 and 13604 and the May 17, 2013 Presidential Memorandum to the Executive Departments and Agencies entitled: Modernizing Federal Infrastructure Review and Permitting Regulations, Policies and Procedures all have the same purpose: To achieve modernization of the Federal Government's review and permitting of infrastructure projects and reduce aggregate timelines for major infrastructure by half.</li> </ul> <p>Similar themes are found in SOCs: ENER 3-X, MAN 2-K, MAN 8-B, MINE 3, MISC-EDIT 7, RR-16</p>

MINE 4	<p><u>The Tongass should be managed in a manner that allows for mining development and enables the Southeast Alaska region to obtain more benefit from mining.</u></p> <ul style="list-style-type: none"> <li>• Managing the Tongass for multiple uses means allowing and designating areas for mining. The Forest Service should take proactive steps to ensure that potential mining exploration activities will not face unnecessary roadblocks and complications. New mining economic activity should be actively encouraged. Corridors for mining activities need to be protected.</li> <li>• There are many economic opportunities available within the Tongass that can be developed and managed in a responsible manner with minimal environmental impacts, which are currently inaccessible, including potential mining projects on Prince of Wales Island and the Katlian Bay Rock Quarry near Sitka. Kensington Mine and Greens Creek Mine provide good jobs with benefits to locale residents.</li> <li>• Better language should be included in the plan to allow new access to potential mineral sites, including roads, helicopters, water and provide for new lease developments for minerals and other mining opportunities.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-I, ENER 3-B, MAN 8-C, MINE 4, TIM 1-C, TIM 1-G, TIM 4-B, TIM 5-A</p>
MINE 5	<p><u>Changes made to the 2008 amended Forest Plan by the court and by the Forest Service since its publication in January 2008 require plan amendments to allow mining to flourish in Southeast Alaska.</u> The Forest Service and the District Court for the District of Alaska have made major de facto Amendments to the 2008 Amended Forest Plan since it was implemented in January 2008, including:</p> <ul style="list-style-type: none"> <li>• In the Minerals and Geology Forest-Wide Standards and Guidelines there is language that can create hesitation in the review process and delay approval of Plans of Operations. A specific plan change suggestion is as follows: the Minerals and Geology Administration (MG2), sub-section III. 4., of the Minerals and Geology Forest-Wide Standards and Guidelines (Forest Plan, page 4-39) should be amended as follows: Following locatable mineral exploration and/ or development reclamation (strike out site rehabilitation and restoration) will be designed (strike out to return the site to as near as practicable to a condition) consistent with the underlying non-mineral Land Use Designation (LUD). (Consult FSM 2840 and 36 CFR 228).</li> <li>• Relevant citations and examples, repeated in other SOCs: <ul style="list-style-type: none"> <li>○ The May 2009 Decision by Secretary of Agriculture, Tom Vilsack, to arrogate to himself all decisions regarding resource development in IRA in the TNF (now delegated to the Chief of the Forest Service), created the belief in senior officials in Region 10 that they should be very restrictive in approving Special Use Permits for access into IRAs.</li> <li>○ The May 2010 Decision to immediately transition from the 2008 Amended Forest Plan ROD Timber Sale Program Adaptive Management Strategy (TAMS) of</li> </ul> </li> </ul>

	<p>harvesting old growth timber on roaded areas and low and moderate value IRAs to harvesting second growth timber on roaded areas of the TNF, further reinforced the belief of Senior Region 10 officials should be very restrictive in approving Special Use Permits for access into IRAs.</p> <ul style="list-style-type: none"> <li>○ By restricting road access and prohibiting timber harvest within IRAs, the 2001 Roadless Rule has made access into and development of mines and renewable energy resource sites very difficult as a practical matter.</li> </ul>
MINE 6	<p><u>The region, communities, businesses, and residents are harmed by their inability to obtain the access necessary to prospect, explore, develop new mines in IRAs,</u> to cut the trees within IRAs necessary to allow the substantial exploration needed to develop a mine, and conduct mine construction. The region is further harmed by the inability of mines to access renewable energy resources in order to provide potentially less expensive, non-carbon power to mining opportunities and development in rural Southeast Alaska.</p>
MINE 7	<p><u>Mining poses a threat to health and welfare of the Tongass. Mineral extraction on the Tongass needs careful scrutiny rather than encouragement.</u> Any mining should maintain productivity of salmon and anadromous fish habitat, including hooligan.</p>
MINE 8	<p>Develop a Greens Creek/Hecla mitigation plan that is favorable to Angoon.</p>
MINE 9	<p>Tribal members look forward to working with mining programs to educate and employ Alaska Natives in the mining industry. The 700 jobs provided on a minimal number of TNF acres by the Greens Creek and Kensington Mines have been an important addition to the economic and social fabric of Southeast Alaska.</p>
MINE 10	<p>Ensure that heritage resources are not being neglected when extractive resources are developed.</p>

## 4.14 PORTS, HARBORS OR LTFS (PORT)

Includes comments made regarding the location or management of ports, harbors or log transfer facilities.

### 4.14.1 Comment Analysis

Two comments were submitted on this topic from two individuals representing Cascadia Wildlands and Sealaska Corporation. No comments on this topic came from form letters.

### 4.14.2 Statements of Concern

PORT 1	Adequate consideration regarding the economic impacts of marine transfer facilities should be fully considered prior to log transfer usage. The decision to use the Pothole for log storage, for instance, was made without sufficient input from crab fishermen.
PORT 2	Log transfer facilities and other access points to salt water need to be identified along with their role in transportation network of the Tongass and Southeast Alaska.

## 4.15 RECREATION (REC)

Comments regarding recreational (non-commercial) use, management, monitoring, or activities.

### 4.15.1 Comment Analysis

A total of 30 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Electric Light and Power Company, Alaska Power & Telephone, All Aboard Yacht Charters & Southeast Alaska Wilderness Tours Association, First Things First Alaska Foundation, Juneau Audubon Society, Ketchikan Chamber of Commerce, Southeast Conference, and the US Forest Service. Comments were submitted by Alaska State Representatives Cathy Munoz and Peggy Wilson as well as former Governor and former Senator Frank Murkowski. Comments were also submitted by the City and Borough of Juneau, Ketchikan Gateway Borough, and the City and Borough of Wrangell. Comments were also presented at the Ketchikan and Wrangell public meetings and from unaffiliated individuals. One comment on this topic came from a form letter.

Over 25% of the comments addressed SOC REC 1, regarding managing recreation and tourism in accordance with updated Recreation Opportunity System guidelines. The next most frequent comments related to REC 5, expressing that Tongass management should be more focused on recreation; REC 3, requesting more recreation facilities; and REC 6, noting that recreation management should be based on sub-regions rather than being applied forest-wide. The remainder of the SOCs for this topic had one to two comments each.

### 4.15.2 Statements of Concern

REC 1	Manage recreation and tourism in accordance with any updated Recreation Opportunity Spectrum (ROS) guidelines. Consider the development of recreation and tourism facilities in conjunction with highways or Renewable Energy Resource projects.  Similar themes are found in SOCs: ENER 3-M, MAN 5-C, REC-1, REC-6, TOUR 1-D, TOUR 1-H, TOUR 3-B, TRANS 4-C
REC 2	The US Forest Service should not reduce access to the Misty Fjords National Monument, Traitors Cove Viewing Observatory.
REC 3	More funding, resources, and facilities are needed for Tongass recreation. Specific interests include more haul-outs for canoeists and kayakers, ore recreation trails and shelters, more simple shelters and cabins.
REC 4	Do not close roads in the Tongass - leave them open for recreational use.

REC 5	<p><u>Recreation should be given higher priority in the management of the Tongass, and more resources should be allocated for recreation access and opportunities in the Tongass.</u></p> <ul style="list-style-type: none"> <li>• The Tongass offers unlimited and diverse recreation potential.</li> <li>• Recreation that preserves the wilderness should be promoted.</li> <li>• The focus of the Tongass transition should be directed towards recreational opportunities as recreation on the Tongass increases.</li> <li>• Management should provide more oversight of recreational uses that could impact wildlife such as snowmobiling, helicopter tours, and jet boating and continue to promote recreational uses that have limited effect such as cabins, kayaking, camping, fishing, hiking, and educational displays. The Forest Plan should reflect these changing priorities.</li> <li>• A strategic plan for the development and management of recreation sites and facilities—tied to Land Use Designations, the ROS, and existing and projected economic development and tourism information—should guide Tongass-wide recreation development.</li> </ul>
REC 6	<p><u>Recreational management issues differ between regions and districts. Recreation management should be based on sub-regions rather than being applied forest wide.</u> Carrying capacities should be permitted to vary by district. The Recreation Opportunity Spectrum (ROS) designations should not be applied to Southeast Alaska. Creating standardized carrying capacities boxes in communities and may prohibit growth and economic development opportunities without affecting the resources.</p> <p>Similar themes are found in SOCs: ENER 3-M, MAN 5-C, REC-1, REC-6, TOUR 1-D, TOUR 1-H, TOUR 3-B, TRANS 4-C</p>
REC 7	<p>Salmon rearing should be considered a recreational land use.</p>
REC 8	<p><u>There should not be a road corridor or power transmission line running through Baranof Warm Springs and Baranof Lake area.</u> It is through an extremely scenic area that experiences very high recreational visitation.</p> <p>Similar themes are found in SOCs: ENER 3-T, REC-8, TRANS 3-I</p>

## 4.16 ROADLESS RULE (RR)

Comments on effect of the Roadless Rule (RR) and about Inventoried Roadless Areas (IRA). This includes comments on the Forest Plan/TLMP, that the Forest Plan didn't consider the RR, effect of RR on ability of forest to produce goods and services, on timber harvest, LUDs, on ASQ, about areas now off limits due to Roadless Rule. Requests to reengage in rulemaking to exempt the Tongass from the Roadless Rule are here also.

### 4.16.1 Comment Analysis

A total of 173 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power Company, Alaska Forest Association, Alaska Miners Association, Alaska Native Brotherhood Camp 70, Alaska Power & Telephone, Central Council of the Tlingit and Haida Indian Tribes of Alaska, Douglas Island Indian Association, First Things First Alaska Foundation, Juneau Chamber of Commerce, Kootznoowoo, Inc., Law Office of James F. Clark, Natural Resources Defense Council, Ocean Renewable Power Company, Organization, Inc., Prince of Wales Community Advisory Council, Resource Development Council, Sealaska Corporation, Sierra Club, Sitka Economic Development Association, Southeast Alaska Power Agency, Southeast Conference, The Nature Conservancy, The Working Forest Group, Trout Unlimited, and the US Forest Service.

Comments were submitted by US Senator Lisa Murkowski, Alaska State Senator Bert Stedman, Alaska State Representatives Cathy Munoz and Peggy Wilson, and former Governor and former Senator Frank Murkowski. Comments were also submitted by the State of Alaska, City of Craig, City and Borough of Juneau, Organized Village of Kake, City of Ketchikan, Ketchikan Gateway Borough, and the City and Borough of Wrangell. Comments were also presented at the Craig, Sitka and Wrangell public meetings and from unaffiliated individuals. There were no comments on this topic submitted by form letter.

Nearly 40% of the comments addressed SOC RR 1, requesting that the forest plan be amended to address the significant changes brought about by re-imposition of the Roadless Rule on the Tongass. Nearly 25% of the comments addressed RR 2, indicating that the terms of the June 2003 Settlement Agreement with the State of Alaska were not fulfilled and that new rules must be adopted exempting the Tongass from the Roadless Rule. The remainder of the SOCs for this topic had one to two comments each.

### 4.16.2 Statements of Concern

RR-1	<u>Amend/revise the Forest Plan because application of the IRA was a significant change.</u> The 2001 RR results in 9.6 million acres of non-timber harvest areas being created on the TNF and is a significant change. Comments were received reflecting how the 2001 Roadless Rule affects the following topics:
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## Timber

- Restricts timber harvest because more than 95% of forest is now closed to logging and the 5% not impacted by IRAs is too small to support harvest level needed for a fully integrated manufacturing industry.
- Removes 300,000 acres of IRAs from the 576,000 acres available for timber harvest under the 2008 Amended Forest Plan; so re-imposition of the 2001 Roadless Rule to the TNF makes it impossible to achieve the selected alternative's stated need for 200 MMBF of economic timber to attain an integrated timber industry. Removing the Forest Service's discretion to provide a sufficient volume of timber to meet market demand violates § 101 of the Tongass Timber Reform Act of 1990.
- Makes the 2008 Amended Forest Plan Timber Sale Program Adaptive Management Strategy (TAMS) impossible to implement (that was the basis of the Regional Forester's decision to select Alternative 6 in the 2008 Amended Forest Plan Record of Decision).
- Impacts the function of existing LUDs, goals and objectives, the suitable and available land base, Old-Growth Conservation Strategy, and other aspects of the Forest Plan. This changed condition has significantly contributed to an insufficient timber supply from the TNF.
- Changes the "suitable and available" Timber Base on the forest. These changes could be incorporated into the Forest Plan through a plan update supplement or edit. The suitable and available timber base will continue to change as land entitlements and land trades are finalized. The Forest Plan is a dynamic plan and will need to be updated and edited periodically to reflect these changes.
- Changes the balance achieved in the Forest Plan between commodity production and measures needed to protect other resource values. Figure 1 in the ROD indicates an ASQ of approximately 85 MMB is available outside of Roadless Areas, or about 1/3 of the ASQ contained in the Plan. By definition all of this would be from NIC I classified lands. This effectively negates the timber component of the Adaptive Management Strategy (ROD, pp 9-10 & 64-65.) and emphasizes the need for plan revision. While the Forest Service may use ASQ from previous years to make up this discrepancy a more permanent solution to the Roadless Rule as applied to the Tongass is required.
- The Transition policy (coupled with Roadless Rule) limits TNF discretion to meet market demand. The removal of 300,000 acres of suitable timber from the Forest Plan and the Secretary's policy to call Transition to second growth on roaded areas makes it impossible for the Forest Service to exercise its

discretion to meet market demand in violation of the TTRA.

#### **Access**

- Prohibits road construction.
- Attached is a submitted map (see page 4-49) showing areas within the TNF where roads are not allowed (in red), basically eliminating opportunities for development, whether for timber, mining, or for renewable energy projects.
- Inhibits telecommunication infrastructure and other projects that would support communities.

#### **Minerals**

- Creates barriers to prospecting, exploration, mining and access to mineral resources. While reasonable access to locatable minerals is technically authorized in Wilderness and IRAs under 36 CFR Part 228, there are very few mines in Wilderness Areas. Even though the 2001 RR specifies: "Reasonable rights of access may include, but are not limited to, road construction and reconstruction, helicopters, or other non-motorized access" (FEIS Vol. 1, 3-329 to 3-350), the experience of the mining community is that Special Use Permits authorizing road access in or near Wilderness Areas are very difficult to obtain (e.g. Quartz Hill).
- While "reasonable access" is technically permitted in IRAs, cutting trees associated with mining exploration and development does not appear to be allowed. There is no mention of mining in the examples provided in the 2001 Rule and ROD of what this section authorizes.

#### **Renewable Energy**

- Severely hinders new hydropower and other renewable energy projects, including access, construction, and maintenance of the project and transmission of power. (Though the RR did exempt the Whitman Lake, Blue Lake, Little Port Walter, Takatz, Schubee Lake, Lake Shelokum, Cascade Creek and Soule River hydroelectric projects, and the Port Frederick tidal power projects, the vast majority fall inside an IRA boundary).
- Withdraws geothermal energy from development because it denies access to new leases for minerals subject to the Mineral Leasing Act of 1920 (including a large geothermal site in Upper Tenakee Inlet that could serve Tenakee, Hoonah and Pelican). There is no explanation in the 2001 Final Roadless Rule and ROD why the access impacts to IRAs associated with locatable minerals is different from the access impacts to IRAs associated with leasable minerals.
- Because there is no mention of new utilities, or any mention of hydropower, it is clear that the 2001 Roadless Rule does not allow new roads for such development. This is untenable and "an important aspect of the problem" not considered by the Rule which makes it arbitrary and capricious in its

	<p>application to the National Forests in Alaska.</p> <ul style="list-style-type: none"> <li>Hydro projects are major construction projects that require heavy machinery and equipment and a road for access. A hydro power project cannot be constructed with helicopters alone. Because the 2001 Roadless Rule prohibits road construction as well as tree cutting, no new hydro projects will be built in Roadless areas.</li> </ul> <p>Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE 2, RR-1, R-19, SOC 2-F, TRANS 4-A</p>
RR-2	<p><u>The terms of the June 10, 2003 Settlement Agreement were not fulfilled and the rulemaking needs to be done again to resolve the legal issues raised by the Court. Adopt rules consistent with the 2003 Settlement with the State of Alaska to exempt the TNF from the Roadless Rule. Correct the errors made in the promulgating the exemption. New rulemaking would provide an opportunity to resolve the contradictions between the Forest Plan and the application of the 2001 Roadless Rule to the TNF. A related comment is to “amend Forest Plan to remove the roadless designations.”</u></p> <ul style="list-style-type: none"> <li>Because of the State's concerns about the problems described above and the significantly adverse impact that it had on the timber industry, the State of Alaska filed a complaint against the 2001 Roadless Rule shortly after it was promulgated on January 12, 2001. The State settled the case with the Department of Justice in June 2003. Consistent with the settlement, the Forest Service promulgated a proposed rule to exempt the Tongass from the 2001 Roadless Rule on July 15, 2003. The Settlement Agreement called for the Federal Government to publish "a temporary regulation that would exempt the TNF from the application of the roadless rule until completion of the rulemaking process for any permanent amendments to the roadless rule." The Forest Service recognized that the June 10, 2003 Settlement Agreement imposed an obligation upon it: "This advance notice of proposed rulemaking, and a proposed rule published elsewhere in today's Federal Register to exempt the TNF from the applicability of the Roadless rule, fulfill these terms of the settlement agreement." On March 4, 2011 the District Court for District of Alaska found the July 15, 2003 Rulemaking to be legally insufficient.</li> <li>For detailed specific arguments see text in Submission Nos. 126271, 126269, 139, and 125 from a joint letter from AP&amp;T and AEL&amp;P; the Juneau Chamber of Commerce; Ketchikan Public Utilities/Lew Williams, Mayor City of Ketchikan; and Alaska Forest Association.</li> </ul>
RR-3	<p><u>The original IRA rule, issued by Executive Order 12866 in 1993, certainly intended to permit access for road construction and utility corridors for all non-forestry projects.</u> The 1993 rule specifically recognized that the impact of the Rule could lead to lost business opportunities, which “may be more pronounced” in Alaska than nationwide – effects in Alaska likely “increasing in the longer term.”</p> <ul style="list-style-type: none"> <li>The goal of the rule was to prevent a “spider-like net” of logging roads from being built throughout the region, but the original rule always intended to permit some roads needed as part of a transportation network and to support other forms of economic development.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS-LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>

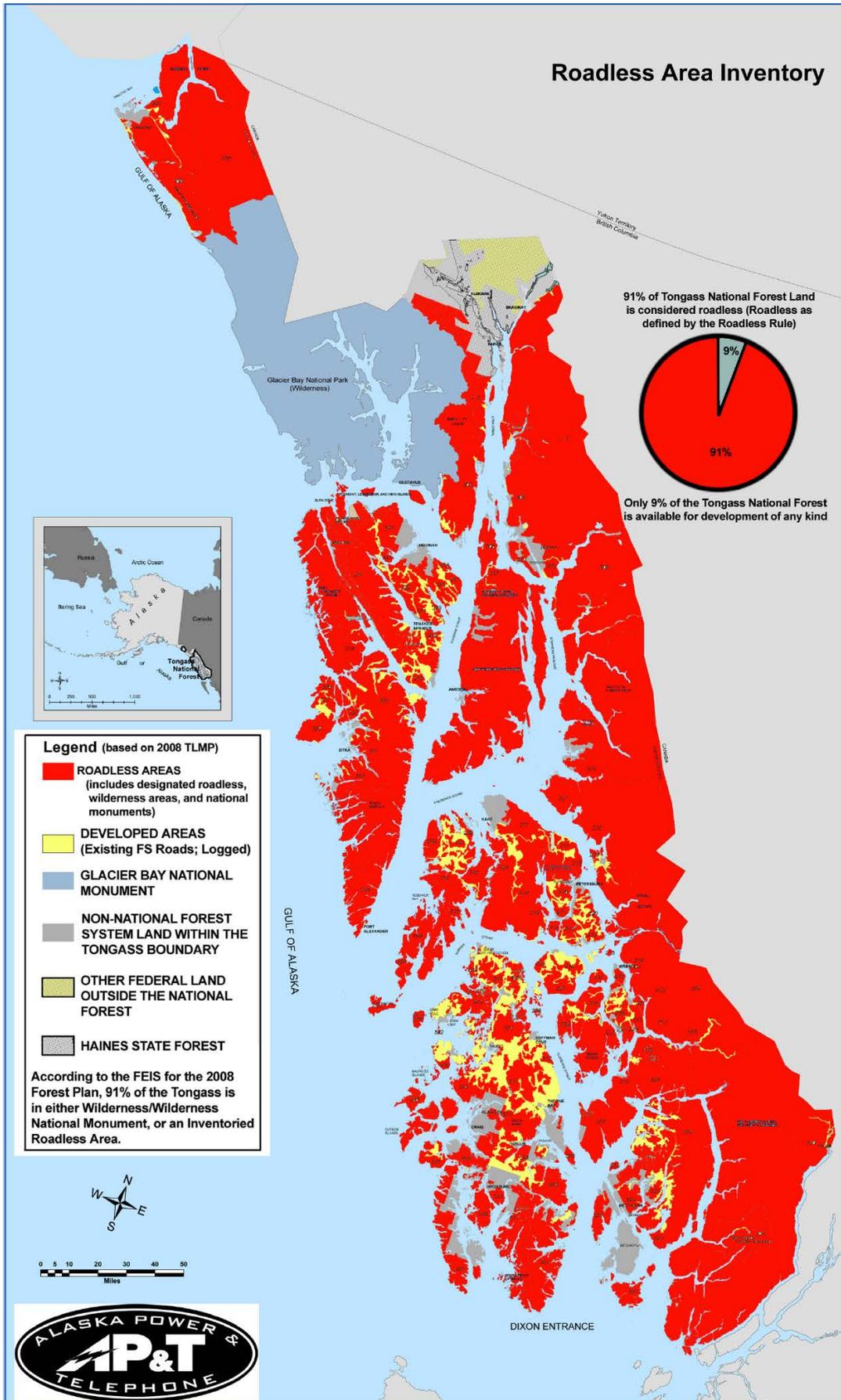
RR-4	<p><u>The Roadless Rule’s “one-size fits all” approach to conservation is inappropriate and harmful to rural communities in Southeast Alaska.</u> The Tongass National Forest should be exempt from the Roadless Rule, so that Alaskans have the same opportunities for quality jobs and economic diversification as other Americans.</p>
RR-5	<p>The 2001 Roadless Rule, and 2008 Amended Forest Plan <u>did not consider or analyze the adverse economic costs, or the opportunity for jobs related to the development of renewable energy resources, to rural Southeast Alaska communities, or the direct economic impact on Southeast Alaska residents.</u> This has restricted access and responsible development to the point of strangling the economy.</p>
RR-6	<p><u>Impact on specific projects that the IRA will harm or prevent:</u></p> <ul style="list-style-type: none"> <li>• Construction of a road up Lynn Canal linking Juneau with rest of the State (the road ROW traverses IRA which will be an obstacle to obtaining FHWA approval)</li> <li>• Communities such as Craig and Klawock are prevented from accessing mines with a road on Prince of Wales Island, thereby denying access to jobs to the residents of those communities and a local workforce to Prince of Wales' mine projects, such as Niblack and Bokan Mountain. There is broad interest on POW Island in developing road access to the mine prospects at Niblack and Bokan Mountain. There will be long-term benefits to island residents from overland access, and, it would benefit the mine prospects by easing delivery of goods and services to the sites and provide for efficient transmission of hydro-generated electricity and the cost-effective operation and maintenance of a transmission line.</li> </ul>
RR-7	<p><u>Implement the Roadless Rule.</u> Revise the Forest Plan to be consistent with the Roadless Rule.</p>
RR-8	<p><u>Repeal the Roadless Rule for the Tongass.</u> The Roadless Rule is a withdrawal in violation of ANILCA. Adopt rules consistent with the 2003 settlement with the State of Alaska to exempt the TNF from the Roadless Rules.</p> <ul style="list-style-type: none"> <li>• The USFS and USDA have authority to reverse the primary cause of decline in timber supply, which is the “Roadless Rule.”</li> </ul>
RR-9	<p><u>Reduce the tally of suitable and available acreage for harvest, that are within IRAs, from the timber base to provide a realistic number of acres in the timber base.</u> Roadless wildlands now allocated to timber LUDs need to be shifted into natural setting LUDs.</p>
RR-10	<p>The RR was not in effect when the Forest Plan was prepared. <u>The Plan needs to change to include application of the Roadless Rule to the Tongass;</u> as well as to account for the Sealaska land-selection legislation and other land transfers.</p>

RR-11	<p><u>Imposition of the Roadless Rule on the Tongass has significantly disrupted the balance reached in the Forest Plan between commodity production and retention areas necessary to protect and maintain other resource values.</u> Setting aside roadless areas from future development negates much of the rationale for design and implementation of the existing retention strategy.</p> <ul style="list-style-type: none"> <li>• New conservation strategies need to be developed that take IRA into consideration. With reinstatement of the Roadless Rule, some of the OGR may not be necessary and should be re-examined if their establishment near roadless areas exceeds what is necessary for habitat purposes. With the RR, it would appear that the Conservation Strategy is now too conservative/restrictive and needs re-evaluation.</li> </ul>
RR-12	<p>Given imposition of the Roadless Rule on the Tongass, and the decision to transition from dependence on old growth for supplying the dependent industry with timber to young growth stands, <u>all previously harvested acreage on the Tongass should be included in the timber base.</u></p>
RR-13	<p>At the very least the RR rule (if not repealed) should be <u>modified administratively to remove hundreds of thousands of acres of economically viable timber from under the rule to provide a longer, more economically sustainable transition to a young-growth industry.</u> It would still be possible to protect much of the 537,451 acres of large old-growth timber (the volume class 6 and 7 stands) that remain in the Tongass, especially since 437,131 acres of such trees (81%) are already protected in conservation areas.</p>
RR-15	<p>Amend the Forest Plan to address the policy change in a May 2009 Secretary Vilsack decision that resulted in <u>the elevation of virtually all local decision-making on IRAs in the TNF to the Chief of the Forest Service</u> has brought national politics into the decision-making process and has altered assumptions upon which the Forest Plan was promulgated in January 2008.</p> <p>Similar themes are found in SOCs: ENER 3-X, MAN 2-B, MAN 2-H, MAN 4-E, RR-15</p>
RR-16	<p><u>The term “reasonable access” as it is used in the context of IRAs should be defined to provide timely (30 day turnaround) and unimpeded issuance of USFS special use permits</u> for those that hold any Federal Energy Regulatory Commission (FERC) permit to allow energy operations to investigate and develop lawfully permitted federal resources.</p> <p>Similar themes are found in SOCs: ENER 3-X, MAN 2-K, MAN 8-B, MINE 3, MISC-EDIT 7, RR-16</p>
RR-17	<p><u>No change to Forest Plan is needed due to IRA.</u> The USFS promulgated and initially instated the Roadless Rule on the Tongass in 2001. Because the Roadless Rule predates the 2008 Forest Plan amendment and does not impact any ongoing project planning or implementation, it is not a significant change that warrants undertaking a Forest Plan revision.</p>

RR-18	<p>The Forest Service has a <u>government to government relations obligation to include the respective tribes</u> that might be impacted in its discussions on the RR and other matters.</p>
RR-19	<p><u>TNF has irrationally allowed RR exemptions for reasonable rights of access, unnecessarily preventing mining and renewable energy projects important to the region.</u></p> <ul style="list-style-type: none"> <li>• The Forest Service earlier this year opposed legislative efforts to permit a road through an IRA to reach either the Niblack or Bokan Mountain gold/Rare Earth Element mines proposed on the southeast side of Prince of Wales Island. Such a road will be vital for residents of Craig, Klawock and those who live on the island’s road system to be able to commute on a daily basis to jobs at the mine, without first having to reach Ketchikan to be transported back to the mines by watercraft. The Forest Service opposition to surface access to the mines also comes in light of the Federal District Court in its 2011 decision reimposing the roadless rule specifically exempting the Bokan Mountain Exploration Plan, the Niblack Mine exploration plan, and the Greens Creek mine geotechnical and tailing expansion plans from coming under the rule. And the opposition to the road comes in spite of the fact that the Forest Service earlier this year classified Southeast Alaska as eligible for aid to combat high unemployment in the region under the Department’s Operation Strikeforce aid program. The Forest Service also has opposed construction access for a Bell Island geothermal project, even though such a plant would be located within a few miles of the existing first segment of a Southeast power intertie. Clearly the IRA Rule should be modified, perhaps as part of the Forest Plan five-year update, to permit reasonable access to mineral developments that will permit such developments to provide greater economic benefits to the region.</li> <li>• The 2001 roadless rule (36 CFR Part 228) allows for “reasonable access” to locatable minerals covered by the Mineral Leasing Act of 1920. The January 2001 regulations (Section 294.12 (b)(7)) permits roads to be built across inventoried roadless areas if needed “in conjunction with the continuation, extension or renewal of a mineral lease on lands that are under lease by the Secretary of the Interior. Such road construction or reconstruction must be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or reasonable surface disturbance and compiles with all applicable lease requirements.”</li> <li>• But the rule is implemented irrationally denying access to mineral developments, including geothermal lease tracts. The rule states, “Reasonable rights of access may include, but are not limited to, road construction and reconstruction, or other non-motorized access,” (FEIS Vol. 1,3-329 to 3-350.) But, Administration-Forest Service policy ignores such tenets.</li> </ul>

	Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE 2, RR-1, R-19, SOC 2-F, TRANS 4-A
RR-20	Since the RR has been in place pressure has increased to only do the minimum necessary to meet Standards and Guidelines; <u>this is reducing conservation effort.</u>
RR-21	<p>US government policies, rules and regulations encourage the use of renewable energy resources as a means to lower carbon emissions from the use of fossil fuels. <u>The 2001 Roadless Rule prevents significant renewable energy development on the Tongass and thus denies rural Southeast Alaska the benefit of these positive environmental attributes.</u></p> <p>Similar themes are found in SOCs: ECO 1-A, ENER 3-E, ENER 3-W, MAN 7-B, MAN 8-E, RR-21, SCIENCE-B, TIM 9-I</p>
RR-22	<p><u>Questions:</u></p> <ul style="list-style-type: none"> <li>• What activities are permitted, and what activities are NOT permitted on roadless land, under the Roadless Rule?</li> <li>• How is the Roadless Rule incorporated into the Forest Plan?</li> <li>• When the Roadless Rule is at odds with the Forest Plan, what happens (answer: the Roadless Rule overrules the Forest Plan).</li> </ul>
RR-23	<p><u>Application of the Roadless Rule to the Tongass. The Forest Service is recommended to conduct</u> forest-level analysis of this change, to include, at a minimum:</p> <ul style="list-style-type: none"> <li>○ Compliance with all applicable federal laws, with specific attention to ANILCA and TTRA;</li> <li>○ Evaluation and determination as to whether the inventoried roadless areas provide a comparable achievement of the Old-Growth Habitat LUD goals and objectives;</li> <li>○ The Forest Service should analyze whether inventoried roadless areas provide a range of habitats capable of supporting viable and well distributed wildlife populations on the TNF. The inventoried roadless areas contain approximately 54 percent (2.7 million acres) of the existing productive old-growth (POG) habitat on the TNF (FEIS, page 3-449), while the Wilderness and Wilderness National Monument areas include an additional 1.5 million acres of old-growth habitat (FEIS, page 3-460).</li> <li>○ Location, area, and functional value of inventoried roadless areas where road construction occurred ("roaded roadless") during the exemption period (2003-2011);</li> <li>○ Determination as to whether the roaded roadless areas are "substantially altered";</li> <li>○ Comparative evaluation of Scenic Integrity Objectives and Visual Priority Routes in roaded versus inventoried roadless areas;</li> <li>○ Existing Scenic Integrity (ESI) ratings were used by the USFS to analyze the degree of intactness of the landscape character, and categorize the degree of alteration visible in the landscape. Approximately 88 percent of the TNF is rated as a Very High ESI, which is a visually unaltered condition, and about 10 percent of the land is rated as Low, Very Low, or Unacceptably Low, which indicates noticeable development activities (FEIS, page 3-404 through 3-405). Areas where development activities are noticeable are generally outside inventoried roadless areas. As such, the scenic values</li> </ul>

	<p>of the TNF may be accommodated by the Roadless Rule.</p> <ul style="list-style-type: none"> <li>○ Evaluation of landscape connectivity, with specific attention to the Beach and Estuary Fringe Forest-Wide Standards &amp; Guidelines;</li> <li>○ Evaluation of the Wildlife Forest-Wide Standards &amp; Guidelines, with specific attention on the legacy and road density provisions;</li> <li>○ Evaluation of whether the Wildlife Conservation Strategy is now too conservative and restrictive, given the areas that are now off limits to development under the Roadless Rule, and</li> <li>○ Evaluation of direct and indirect effects on the access to and development of locatable, leasable, and salable mineral deposits, and renewable energy resources.</li> </ul> <p>Note that in order to consolidate and list similar topics together, some of the bullets above came from comments coded to MAN 2-A.</p>
RR-24	<p>Under the Timber Sale Program Adaptive Management Strategy (TSPAMS), logging was delayed on exceptional wildlands like Neka Bay, Ushk Bay, Port Camden, East Kuiu, Port Houghton, the Back Channel, and the Cleveland Peninsula. <u>Although described as an “adaptive management approach,” these lands remain in the timber base and should be removed.</u></p>



## 4.17 SOCIOECONOMICS – CHANGED CONDITIONS (SOCIO 1)

Comments on changes in social or economic conditions or impacts to local communities, regional economy, or national economy since the 2008 Forest Plan was prepared, that must be considered as the Forest Plan is updated. This section also includes comments about the role or contribution of different economic sectors in the region.

### 4.17.1 Comment Analysis

A total of 50 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Power & Telephone, Alaska Wilderness League, All Aboard Yacht Charters & Southeast Alaska Wilderness Tours Association, California Forestry Association, Cascadia Wildlands, Central Council of the Tlingit and Haida Indian Tribes of Alaska, H & L Salvage, Metlakatla Indian Community, Pacific Fishing Incorporated, Prince of Wales Community Advisory Council, Sitka Conservation Society, Southeast Alaska Conservation Council, The Nature Conservancy, Trout Unlimited.

Comments were submitted by US Senator Lisa Murkowski and Alaska State Representative Cathy Munoz. Comments were also presented at the Craig, Juneau, Ketchikan, Petersburg and Wrangell public meetings and from unaffiliated individuals. One comment on this topic was submitted by form letter.

Nearly 50% of the comments addressed SOCIO 1-A, expressing that significant changes have occurred in the economy of Southeast Alaska that are very relevant to the forest plan, related to economic markets, demographics, and relative importance of different economic sectors in the region. Other comments were rather evenly spread among the other seven SOCs.

### 4.17.2 Statements of Concern

SOCIO 1-A	<p><u>Changes have occurred in the economy of Southeast Alaska since the Forest Plan was adopted in 1997, amended in 2008, and to today.</u></p> <ul style="list-style-type: none"><li>• The economic markets and demand for timber have greatly declined.</li><li>• Regional population has declined.</li><li>• The current primary industries in the Tongass include the salmon and tourism industries, which offer a more sustainable economic base for the region. It is essential that the subsistence economy be sustained.</li><li>• Changes to the region's economy, and realistic data and projections about the capacity and sustainability of each industry, need to be reflected in the Forest Plan.</li><li>• The increase in world-wide demand and prices for fuel, energy, and</li></ul>
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	<p>minerals has changed the demands on the resources of the Forest. The Plan has to change to place more emphasis on managing for these newly important uses while maintaining conservation safeguards for habitat.</p> <ul style="list-style-type: none"> <li>• Urge that the Forest Service seek an independent third party to do an in-depth assessment of what has happened to the communities of Southeast Alaska in terms of social and economic conditions, and how the decline in the timber sector of the economy has contributed to deterioration.</li> </ul>
SOCIO 1-B	<p><u>Mining is an important current and potential contributor to the region's economy.</u></p> <ul style="list-style-type: none"> <li>• There is a tremendous demand for minerals that did not exist 15 years ago that needs to be reflected in the Forest Plan.</li> <li>• The 700 jobs provided on a minimal number of Tongass National Forest acres by the Greens Creek and Kensington Mines have been an important addition to the economic and social fabric of Southeast Alaska.</li> </ul> <p>See also more specific comments regarding the contributions of the timber industry in the MINE section.</p>
SOCIO 1-C	<p><u>The timber industry continues to be an important economic contributor in Southeast Alaska:</u></p> <ul style="list-style-type: none"> <li>• Prince of Wales (POW) Island has one medium sized mill and a number of smaller mills. Many of the people employed at these mills and those that harvest timber for the mills have families and live here year round. The multilayered benefit of these jobs contributes to nearly every school, business and community on POW. It should also be noted that some of these mills are actively pursuing new opportunities with young growth timber and in wood fuels to reduce dependence on old growth and fossil fuels. In addition, several of these mills produce important, high-value wood products from old growth such as wood for guitars and pianos – such wood cannot be found in many other places in the world and is therefore a unique and valuable asset for our local businesses. Together this variety of milling and wood-based businesses is critical to a diversified economy.</li> <li>• Despite the fact that the timber industry is much smaller, it is still an important part of the regional economy and is a provider of jobs. Tourism, fishing, hunting, and wildlife observation jobs cannot be substituted for timber jobs in rural communities. They do not provide the economic base that the timber industry once provided.</li> <li>• We have ... been devastated by the shutdown of logging, although our timber industry is the most renewable resource we have.</li> </ul>

	See also more specific comments regarding the contributions of the timber industry in the TIMBER section.
SOCIO 1-D	<p><u>Tongass timber sale procedures systematically overestimate market demand.</u> The Forest Service should take this opportunity to update its procedures by evaluating new market information, such as SEACC's recent publication, "Buy Local: Alaskan Wood, Alaskan Jobs." Addressing the needs of local small-scale mills helps meet local demand for high value specialty wood products and enhances the economic vitality of Southeast Alaska communities instead of supporting unsustainable export-driven economic models.</p> <p>See <a href="http://seacc.org/healthy-forests/small%20mills">http://seacc.org/healthy-forests/small%20mills</a>.</p> <p>Similar themes are found in SOCs: ENER 1-G, ENER 2-A&amp;B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&amp;E, SOCIO 2-A, SOCIO 2-P, SUB 3-C</p>
SOCIO 1-E	<p><u>The cost of energy in rural Southeast Alaska is extremely high,</u> with many communities now relying on diesel generation and paying 60 cents or more per kilowatt hour. Renewable energy projects would be a boon to the region's economy and help businesses and families who struggle with high electricity and heating bills. Lower energy costs would increase the economic competitiveness of communities and create jobs.</p> <p>See also more specific comments regarding the current and potential contributions of the renewable energy sector in the ENERGY sections.</p>
SOCIO 1-F	<p><u>The fishing industry (particularly salmon) is the key economic drive in the region.</u> Salmon prices remain strong and markets continue to expand, so much so that recent research pegs the commercial, sport and subsistence salmon harvest value at \$1 billion annually in Southeast Alaska and this sector provides one out of every ten jobs in the region (more than 7,200 jobs).</p>
SOCIO 1-G	<p><u>The visitor services or tourism industry is the fastest growing economic sector in Southeast Alaska,</u> accounting for roughly 10,200 jobs and contributing another \$1 billion annually to the region. Maintenance of habitat for fish and wildlife is important to sustaining this industry.</p> <ul style="list-style-type: none"> <li>• The industry has grown in the past 30 years from a handful of tour operators to a predominant role in the economic development of many communities in Southeast, Alaska from Juneau to Wrangell and for communities like Hoonah.</li> </ul> <p>See also more specific comments regarding the contributions of the tourism industry in the VISITOR SERVICES sections.</p>

## **4.18 SOCIOECONOMICS – FOREST SERVICE DECISIONS, “TRIPLE BOTTOM LINE” (SOCIO 2)**

Comments about the Forest Service’s role in the economy of Southeast Alaska and its communities, including comments related to: (1) The Forest Service’s role in supporting economic opportunities and jobs and addressing the current difficult economic conditions in rural Southeast Alaska; (2) The “Triple Bottom Line”; or (3) Urging the Forest Service to focus its policies, energy and resources to stimulate and support particular industries or economic sectors.

### **4.18.1 Comment Analysis**

A total of 199 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power, Alaska Forestry Association, Alaska Miners Association, Alaska Native Brotherhood, Alaska Power & Telephone, Alaska Wilderness League, All Aboard Yacht Charters & Southeast Alaska Wilderness Tours Association, Cascadia Wildlands, Central Council of the Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, Head Start Schools, Juneau Audubon Society, Juneau Chamber of Commerce, Ketchikan Chamber of Commerce, Kootznoowoo, Inc., Latitude Adventures LLC, Organization Inc., Pacific Fishing, Inc., Renewable Energy Alaska Project, Resource Development Council, Southeast Conference, Sealaska Corporation, Sitka Economic Development Association, Southeast Alaska Conservation Council, The Nature Conservancy, The Working Forestry Group, Trout Unlimited, Un-Cruise Adventures, and University of Alaska Southeast.

Comments were submitted by US Senator Lisa Murkowski, Alaska State Representative Peggy Wilson, and former Governor and former Senator Frank Murkowski; by the City of Craig, City and Borough of Juneau, City of Ketchikan, Ketchikan Gateway Borough, Municipality of Skagway, the City of Tenakee; and the State of Alaska. Comments were also presented at the Craig, Ketchikan, Petersburg and Wrangell public meetings and from unaffiliated individuals. Twenty-five of the comments on this topic were submitted by form letter.

Nearly 20% of the comments addressed two of the SOCs. These are SOCIO 2-A, describing the difficult economic conditions faced in rural Southeast Alaska communities and the importance of Forest Service Actions in addressing economic sustainability; and SOCIO 2-H, requesting that the Tongass revise the forest plan and take action to provide for a sustainable forest products industry. About 10-15% of the comments were addressed to each of three SOCs, SOCIO 2-E, requesting that the Tongass focus on safeguarding habitat and supporting sustainable economic sectors (non-timber); SOCIO 2-F, asking for more access to facilitate economic development; and SOCIO 2-G, requesting a Renewable Energy Resource Plan and Land Use Designation. The other SOCs each just had one to four comments.

#### 4.18.2 Statements of Concern

SOCIO 2-A	<p><u>Comments regarding difficult economic conditions in many rural communities in Southeast Alaska, and the importance of Forest Service management actions to the economic sustainability of the region, communities, and families, including:</u></p> <ul style="list-style-type: none"><li>• Concern about escalating negative socioeconomic impacts to southeast Alaska communities from the lack of a well-balanced, active management approach to the forest resources of the Tongass.</li><li>• At present, rural southeast Alaskan communities are suffering from high levels of poverty and 15% average unemployment, due to federal restrictions placed on how the Tongass can be used. There are many economic opportunities available within the Tongass that can be developed and managed in a responsible manner with minimal environmental impacts, which are currently inaccessible. Examples include potential mining projects on Prince of Wales Island, as well as economic timber sales. Please assure that the Tongass is managed in a way that provides communities in southeast Alaska with equitable opportunities for quality employment and economic growth.</li><li>• Our federal government is attempting to reverse unemployment, stimulate economic growth, and eradicate poverty in the US and worldwide. It is unfortunate that meanwhile, through restrictions on the Tongass National Forest, our federal government is producing conditions of poverty and high unemployment in Alaska. The Forest Service must take the opportunity to correct these conditions by amending the Forest Plan.</li><li>• The Forest Service must consider economic development and stability to rural communities that are surrounded by and depend on the resources of the Tongass.</li><li>• The opportunity for local residents to earn a living here in the Tongass should be paramount to whatever decisions are made regarding the Forest Plan.</li><li>• The Forest Plan does little to respond to the disproportionate number of “warning signs” that indicate the adverse effects of the socioeconomic disparity experienced by the rural communities living in poverty within the Tongass.</li><li>• The majority of Southeast communities have experienced significant population decline over the past ten years as families migrate out of the region in search of economic opportunity and security elsewhere. Secondary impacts of the population loss have had far reaching consequences in many communities including declining school enrollments, decreasing municipal tax bases, and difficulty transitioning to</li></ul>
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	<p>alternative local economic drivers (Timber Jobs Task Force Final Report, Appendix 8, 2012).</p> <ul style="list-style-type: none"> <li>• Southeast Alaskan families, communities, and businesses have suffered tremendously from the Tongass National Forest's reduced supply of timber. Statistics alone cannot reflect the human suffering endured, but it is staggering. Roughly 90 percent of timber jobs and wages paid for those jobs were lost over the last two decades; 3,986 to 361 jobs and \$155.9 million to \$16.9 million (Alaska Department of Labor). The consequences have been far reaching, particularly for the communities surrounded by the Tongass. Both population and school enrollments have declined. On average, a seven percent and 12 percent population decline in the past two decades and a 15 percent decline in school enrollment since 1990 (Alaska Department of Commerce, Community, and Economic Development). Six schools have closed since 1990 and another seven schools hover on the brink of closure. With a minimum enrollment requirement of ten students, a single logging family can make the difference of a school staying open.</li> <li>• The Forest Plan should assess the value of contributions to the economy from TNF lands and management activities.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-G, ENER 2-A&amp;B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&amp;E, SOCIO 2-A, SOCIO 2-P, SUB 3-C</p>
SOCIO 2-B	<p><u>Concern that Forest Service decisions that significantly affect the lives of community and regional residents are overly influenced by special interest groups who want to reduce development on the Tongass, but are not substantially affected by decisions that affect the local economy and the availability of jobs.</u></p>
SOCIO 2-C	<p><u>Request that the USFS work with communities to determine how the Tongass Forest Plan can support the economic and social interests of communities in the region.</u></p>
SOCIO 2-D	<p><u>Request that the Tongass be guided by the “Triple-Bottom Line” (TBL) in its planning, permitting and other decisions.</u> By definition, the TBL solution must meet or exceed all environmental and social/cultural requirements of the land base while at the same time providing a sustainable level of economic activity, which covers all costs related to managing the land base. More specific comments related to the TBL include:</p> <ul style="list-style-type: none"> <li>• The Working Forest Group developed the concept of a working forest, which uses forest resources to created jobs and healthy communities through active forest management guided by a TBL approach. In Southeast Alaska, there is currently an unbalanced relationship between the three “bottom lines” (environment, society, economy), causing major challenges for state and local governments and communities. Federal policy has shifted away from using forest resources on a sustainable basis to a</li> </ul>

preservation-oriented approach.

- Over the last few months, Southeast Conference has analyzed a range of alternative conservation strategies that could be implemented on the Tongass National Forest. The focus of the conservation strategy analyses was the development of a sustainable, TBL resources management solution. For a forested land base such as the Tongass, the primary revenue generating economic activity is normally timber harvests, although other activities, such as wildlife viewing and ecotourism, are also important and do provide revenue. The approach used in the development of the alternative conservation strategies for the Tongass is an integrated resource management strategy whereby the land base is spatially managed for all resource objectives simultaneously, taking advantage of forest dynamics and the capabilities of individual forest stands across the land base to meet varied resource objectives over time. Using such an approach enables the entire land base to contribute to all objectives, in contrast with dividing the land base up into zones or reserves that are only allowed to contribute to designated objectives. This proactive approach to forest management enabled the development of conservation strategies that would improve the level of wildlife habitat protection over time (more total habitat and better distributed wildlife habitat) while also supporting a viable forest industry with profitable harvest and manufacturing levels of 300 - 400 million board feet per year. This management style will also give flexibility to allow other opportunities such as access for energy projects and mining. With a viable forest industry and the associated proactive forest management strategy, much of the current Tongass expenditures on restoration and facilities maintenance would no longer have to be funded by the taxpayers but rather could be part of the forest sector's forest management program. Our analyses show that such an integrated industry could support over 2,000 direct jobs resulting in an economic gain of approximately \$535 million per year to the regional economy. These benefits would be spread across the region, particularly benefitting the smaller, rural communities where forest management and manufacturing activities would take place. (See Submittal #157 for additional detail.)
- The Forest Service should take a Triple-Bottom Line approach to its timber sale program, to identify and offer additional acres of economic timber, and to put emphasis on sustainable uses of renewable forest resource like timber, energy and mining – rather than the current disproportionate focus on non-consumptive multiple uses.

Similar themes are found in SOCs: MAN 4-C, SOC2-D, TIM 1-E

SOCIO 2-E	<p><u>Requests that the USFS focus its policies, energy and resources on safeguarding fish and wildlife habitat, and supporting a suite of sustainable economic sectors, including: fishing, tourism, recreation, subsistence, and research and education, rather than continuing its focus on old growth timber harvest.</u> (Note: comments that directly reference the 2010 Transition Plan, or address a “transition” or “shift” from old growth timber harvest to management focused on young growth and/or the sectors listed above are coded to MAN-9).</p>
SOCIO 2-F	<p><u>Request that the USFS focus on providing access, as a key component to facilitating uses important to the economy and social environment on the Tongass.</u> Access is essential to facilitate:</p> <ul style="list-style-type: none"> <li>• Mineral exploration and development (e.g., Niblack and Bokan Mountain on Prince of Wales Island)</li> <li>• Timber harvest</li> <li>• Young growth sustainable timber industry</li> <li>• Renewable energy development – including hydroelectric projects, other renewable energy resources, and transmission from the sites of these resources to communities</li> <li>• Recreation and tourism</li> <li>• Access to forest resources for personal use (e.g., hunting, berry gathering, cultural uses)</li> </ul> <p>More specific comments about this issue are detailed under the Roadless Rule (RR) section.</p> <p>Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE 2, RR-1, R-19, SOC 2-F, TRANS 4-A</p>
SOCIO 2-G	<p><u>Request that the USFS focus on developing a Renewable Energy Resource Plan and Renewable Energy Resource Development LUD, as a primary means of providing affordable, sustainable energy and spurring economic development in Southeast Alaskan communities and the region.</u></p> <ul style="list-style-type: none"> <li>• A renewable energy strategy, plan and development would allow entire communities in Southeast Alaska to significantly decrease greenhouse gases and other emissions, reduce the need for shipment of and potential spills of diesel fuel, and operate these communities’ economies and localized industries at a lower cost. Further, renewable energy is shielded from fuel inflation costs that have exacerbated economic problems in rural Tongass communities that depend on fossil fuels.</li> <li>• Renewable energy can significantly reduce the operating costs of industries and improve economic competitiveness.</li> <li>• Southeast Alaska’s renewable energy resources far exceed local demand</li> </ul>

	<p>and can be marketed outside of the State.</p> <p>More specific comments about this issue are detailed under the ENERGY section (ENER 3).</p>
SOCIO 2-H	<p><u>Request that the Tongass revise the Forest Plan and take action to provide the resources to support a sustainable forest products industry in Southeast Alaska.</u></p> <ul style="list-style-type: none"> <li>• Changes in management policy for the Tongass forest eradicated the former timber industry, plunging Southeast Alaska communities into poverty and unemployment.</li> <li>• The Forest Plan revision must consider and revise the actual lands selected for timber harvest, and the standards and guidelines that guide such harvest.</li> <li>• The plan must evaluate the barriers to providing a constant and reliable supply of wood, which is what is needed to conduct manufacturing businesses.</li> <li>• There is not enough economic timber offered. The Forest Service reduced the 2.5 million acres of land that was to be managed for timber down to less than 700,000 acres. There needs to be a complete revision of the Plan, and that revision needs to include selection of an average mix of high and low elevation, difficult and easy, and high and low value timber.</li> <li>• The Forest Plan finally approved in 1999 to implement the Tongass Timber Reform Act anticipated a harvest of between 153 and 187 MMBF, with the Forest Service being required to "seek to meet" the demand for then existing mills for wood fiber. In 1999 the harvest level still reached 146 MMBF. But for a host of factors, sales have declined dramatically this century. In 2005 sales hit a mark of 50 MMBF, sales over the past eight years having averaged just 35.5 MMBF. Well more than 5,000 timber jobs have been lost: Ketchikan having lost a 500-employee pulp mill, two 100 employee sawmills and an 100-employee veneer plant, Sitka having lost a 500-employee pulp mill, Prince of Wales Island, a 25-employee sort yard, and 700 logging and road building jobs, Wrangell having lost an 100 employee saw mill and 100 jobs in the logging and road building industry, Metlakatla having lost a 100 employee hemlock mill and 100 jobs in road building and logging, and other parts of the region having faced steep indirect job losses, reducing the industry's contribution to the economy by more than \$450 million. Given the rebound in global demand for Tongass timber, a significant number of those job losses are unnecessary from an environmental or economic standpoint.</li> <li>• For decades, the TNF was managed as a working forest, and the Southeast Alaska economy thrived. The forest industry was one of the largest economic sectors in Alaska with 4,600 jobs, mostly spread throughout the</li> </ul>

	<p>Southeast Panhandle. Large manufacturing facilities, including two major pulp mills in Sitka and Ketchikan, were major anchors of the region's economy and local tax base. Under the Alaska National Interest Lands Conservation Act, up to 520 million board feet (MMBF) of timber could be harvested each year, which was still under what the forest could sustain in perpetuity. However, the industry has undergone a major transformation in the past 20 years with new land withdrawals and adverse public policy decisions sharply curtailing the timber supply to local mills. Today the pulp mills are gone and there is only one medium-size sawmill remaining in the region, and it's struggling for survival. According to the Alaska Department of Labor, statewide there were only 364 people directly employed in forestry and logging jobs last year. There were an additional 220 wood products and manufacturing jobs. Today, only four percent of the entire TNF is available for harvest. Of the forested commercial grade timber, six percent is available for logging. Over the past 100 years, only seven percent or approximately 430,000 acres of the total productive old-growth timber have been logged in the TNF. Only 15 percent of the highest volume stands has been harvested, while about 85 percent of the forest's largest old-growth remains untouched. Under the federal government's current management direction, the TNF is likely to produce little in the way of resources to support local economies. Changes to Forest Plan have trumped the congressional mandate to provide for the needs of citizens and communities. The evolution of forest management has effectively redefined the very purpose for which the national forests were established, in direct contradiction to the congressional intent. Although the TNF was established as a working forest, today it is being managed more like a national park.</p> <ul style="list-style-type: none"> <li>• Concern that restoration projects are not a replacement for the socioeconomic contributions of the timber industry, and restoration projects should not result in reduced staffing and activity levels in the USFS timber program.</li> </ul>
SOCIO 2-I	<p>Request that the Tongass <u>more proactively support the visitor services / tourism industry.</u></p> <ul style="list-style-type: none"> <li>• Protect the fish and wildlife resources, habitats and other attributes of the Tongass that attract visitors to Alaska.</li> <li>• The Tongass should increase its expenditures in the recreation/tourism program areas, through a reallocation of appropriated funds and identification of diverse funding sources.</li> </ul>
SOCIO 2-J	<p>Request that the Tongass <u>reallocate significant budgetary resources toward planning and implementing projects designed to support the fishing industry.</u></p>

SOCIO 2-K	<p>Request that the USFS <u>recognize that fishery enhancement projects are beneficial to multiple users and the economy of Southeast Alaska, and remove policy barriers to development of enhancement projects.</u></p> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>
SOCIO 2-L	<p>Request that the USFS <u>change the Forest Plan and take actions to support development of a strong mining industry in Southeast Alaska to provide socioeconomic benefits to the region.</u> More specific comments about this issue are detailed under the MINE section.</p> <ul style="list-style-type: none"> <li>• The Forest Service should encourage changes to mining laws on the national level, to allow a vibrant and growing mining industry in Southeast Alaska.</li> <li>• Development of mining resources could help diversify the economy and provide opportunities beyond forest products, fishing and tourism, especially when litigation often prevails over timber sales. With Southeast Alaska experiencing a significant economic downturn due to the sharp reduction in access to federal timber, any new economic activity, such as mining, that promises to bring in high paying jobs should be actively encouraged by the Forest Service. The Forest Service should take proactive steps to ensure that potential exploration activities will not face unnecessary roadblocks and complications. The goal of many Alaskans is to seek a more diverse and strong economy in Southeast Alaska. Forestry and mining are key to reaching that goal.</li> </ul>
SOCIO 2-M	<p>Request that the USFS <u>focus on a smaller scale timber industry,</u> such as locally owned, small logging and value added operations that maximize local skills and money in communities.</p> <p>Similar themes are found in SOCs: SOC 2-M, TIM 6-D, TIM 9-B</p>
SOCIO 2-N	<p>Request that the USFS focus on ensuring that people have access to ample <u>firewood</u> for heating their homes.</p>
SOCIO 2-O	<p>Request that the USFS focus on the use of forest resources for <u>local biomass as an energy source and commercial industry for the region.</u></p> <p>Similar themes are found in SOCs: All ENER 2 SOCs, LUD NEW/ENER-8, MAN 6-E, MAN 7-C, MAN 8-A, SOCIO 2-O, TIM 1-D, TUS LUD-3</p>

SOCIO 2-P	<p>Comment that the <u>region's population is growing and the economy is strengthening, though these positive changes are not being seen everywhere in the region, with the small communities being especially vulnerable</u> to population loss and economic disruption. The encouraging trends are due in large part to the Tongass National Forest providing for a diversity of economic opportunities (Southeast Conference 2012 report, Juneau Economic Development Council 2013 report).</p> <p>Similar themes are found in SOCs: ENER 1-G, ENER 2-A&amp;B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&amp;E, SOCIO 2-A, SOCIO 2-P, SUB 3-C</p>
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## 4.19 SOCIOECONOMICS – MULTIPLE USE/BALANCE (SOCIO 3)

Comments related to managing the Tongass for multiple use, finding the balance among uses, and concerns about impacts of one or more use(s) on other resources and uses.

### 4.19.1 Comment Analysis

A total of 33 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: All Aboard Yacht Charters & Southeast Alaska Wilderness Tours Association, Cascadia Wildlands, Port Protection Community Association, Prince of Wales Community Advisory Council, Southeast Alaska Fishermen’s Alliance, and Trout Unlimited.

Comments were also submitted by the City of Craig, presented at the Petersburg public meeting, and submitted by unaffiliated individuals. Thirteen of the comments on this topic were unique substantive comments added to a form letter.

In addition to the form letters with additional unique comments, that were included in the counts of commenters noted above, an additional 18,354 signatures/comments from three form letter campaigns were submitted on Statement of Concern SOCIO 3-B. See the Submission Index on the last page of this document for more information.

Nearly 60% of the unique comments addressed SOCIO 3-B, requesting that the forest plan find a new balance among uses that deemphasizes old growth logging and focuses on a diverse suite of uses sustainable under current economic conditions. Nearly 30% addressed SOC 3-A, general comments supporting management for multiple use and acknowledging the challenges of achieving a balance.

### 4.19.2 Statements of Concern

SOCIO 3-A	<p><u>General comments supporting management for multiple use and recognizing the challenges of achieving balance:</u></p> <ul style="list-style-type: none"><li>• Finding a balance between the logging industry, eco tour operators and the needs of communities becomes the key to a successful transition.</li><li>• Many areas have a conflict between hydroelectric projects and other uses.</li><li>• The Multiple Use-Sustained Yield Act provided sustainable multiple benefits to the public through proper management and use of our natural resources which include abundant fish and wildlife and a supply of timber-related products. Exactly 44 years ago on Aug. 27, 1969 a representative of the USFS explained multiple use as "Wood, water, forage, recreation and wildlife are given equal consideration in forest</li></ul>
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	<p>management. Forests are managed for the greatest good for the most people in the long run, not for temporary benefit and not necessarily the greatest dollar value." The public awaits this promise and if it cannot be delivered then public should be entitled to a public response from the USFS.</p> <ul style="list-style-type: none"> <li>• Decades of both commercial logging and commercial fishing in and near the Tongass show that extraction of both fish and timber are compatible uses of the public forest. Support efforts to manage the forest for the benefit of those commercial users, as well as the wide variety of sport, subsistence, recreational, and personal uses on the Tongass.</li> <li>• Support management for multiple use and sustainability.</li> <li>• Take a more holistic approach that considers not only the timber aspects, but also the fishery resources and importance of the Tongass to Southeast communities and their economies.</li> <li>• If the Forest Service is incapable of managing the Tongass for more than merely short-term consumptive purposes, management should be transferred away from the US Forest Service to the National Park Service.</li> </ul>
SOCIO 3-B	<p>The Forest Plan needs to find a new balance among uses, with a <u>transition away from old growth logging to a diverse suite of uses that are sustainable under current economic conditions</u>. Comments note:</p> <ul style="list-style-type: none"> <li>• Old growth logging threatens the region's main economic drivers of fishing and tourism, hurts local communities, restricts customary and traditional uses of the land, and adversely impacts important fish, wildlife and watershed resources.</li> <li>• Old growth logging is no longer economically profitable and sustainable due to changing economic and market conditions, without federal subsidies.</li> </ul>
SOCIO 3-C	<p>Demand that <u>the Tongass be freed from restrictions and managed for the benefit of all Americans</u>. These benefits include responsible logging and mining activities, expanded ATV use, unrestricted sport hunting and fishing by all Americans, use of all lands for recreational hiking, biking, camping, ATV riding, snowmobiling, skiing, exploring, etc. <u>Any logging, mining, or other restrictions of forests by federal land managers is unacceptable</u>.</p>

## 4.20 SUBSISTENCE – DEER (SUB 1)

Comments about the value of, need for, protection of, or impact to deer for subsistence, food, or traditional and customary uses.

### 4.20.1 Comment Analysis

A total of 14 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Wilderness League, Cascadia Wildlands, Defenders of Wildlife, Earthjustice, League of Conservation Voters, National Audubon Society, Natural Resources Defense Council, Sierra Club, and Southeast Alaska Conservation Council. No comments on this topic were submitted by form letter.

Over 50% of the comments addressed SOC SUB 1-C, commenting that large-scale old-growth timber cutting is not a viable option if the forest is going to maintain adequate deer and wolf populations and the associated subsistence and other hunting opportunities vital to local communities. The other four SOCs received from one to four comments each.

### 4.20.2 Statements of Concern

SUB 1-A	<p><u>It is often said that “population trends appear stable” for management indicator species, but that is not the case for deer. Severe declines of deer have occurred in several places, such as Prince of Wales Island, Kupreanof Island, Mitkof Island, Lindenberg Peninsula, and Kuiu Island. Deer subsistence opportunities are reduced to nothing on Mitkof and Lindenberg; people are reluctant to try because the chance of success is so slim. The most serious problems occur when stem exclusion and hard winters coincide. Habitat restoration will not replace deer winter habitat, which is so crucial to providing local people with subsistence. <u>When planning timber sales, the Forest Service must actively pursue only those alternatives that would not result in restrictions on subsistence deer harvest. The wolf standard and guideline of 18 deer per square mile should be used to assure adequate deer habitat for hunters’ needs.</u></u></p>
SUB 1-B	<p><u>Deer population declines due to timber harvest disproportionately impact poorer subsistence users who can’t afford to go farther for success. Going farther is also more dangerous. The environmental justice implications of where timber harvest is concentrated should be more carefully considered. The most accessible timber often coincides with the most accessible deer hunting areas.</u></p>
SUB 1-C	<p><u>Continued large-scale old-growth timber cutting is not a viable option if we are to maintain adequate deer and wolf populations and the associated subsistence and other hunting vital to local communities. Strengthen the wildlife conservation strategy because it has failed to ensure healthy, abundant populations of important species. The USFWS comments on the Big Thorne timber sale express concern that deer habitat capability is already below the Forest Plan standard of 18 deer per square mile throughout the biogeographic province, and is projected to decline</u></p>

	<p>further. The Forest Service too has projected that in some areas of POW hunting restrictions will be needed even if no further logging occurs. According to the Big Thorne DEIS, the proposed action and similar future projects will cause further reductions in deer and wolf populations. Biologists studying the issue question whether it is possible; based on existing habitat conditions even with no further logging, to have a long-term resilient predator-prey relationship on Prince of Wales Island that includes wolves, deer, and humans.</p>
SUB 1-D	<p><u>Deer habitat is needed so people in the Tongass can obtain food through hunting.</u></p>

## 4.21 SUBSISTENCE – SALMON, STEELHEAD AND OTHER FISH (SUB 2)

Comments about the value of, need for, protection of, or impact to salmon, steelhead and other fish for subsistence, food, or traditional and customary uses.

### 4.21.1 Comment Analysis

Only one comment was submitted for this Topic of Concern, by a private individual. This commenter requested that the forest plan include better information on the Unuk River hooligan run, which has diminished to the point that Native tribes can no longer harvest this resource.

### 4.21.2 Statements of Concern

SUB 2-A	Better information is needed on the Unuk River and why Hooligan runs have diminished here to the point that Native tribes can no longer harvest them. This is especially important because the Eskay Mine (British Columbia, Canada) operated here from 1998-2008 and there is no information about whether acid drainage or other mine-related impacts are part of the problem, and, more mining is proposed in area.
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## 4.22 SUBSISTENCE – OTHER (SUB 3)

Comments about the value of, need for, protection of, or impact to other forest resources for subsistence, food, or traditional and customary uses.

### 4.22.1 Comment Analysis

A total of 16 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Klawock Heenya Corporation, Latitude Adventures LLC, and Sealaska Corporation. Comments were also submitted by the Organized Village of Kasaan, and presented at the Craig and Petersburg public hearings, and by unaffiliated individuals. No comments on this topic were submitted by form letter.

The comments were quite evenly distributed among the nine SOCs generated for this Topic of Concern.

### 4.22.2 Statements of Concern

SUB 3-A	<p><u>Alaska Natives use many forest and plant resources in the Tongass for subsistence, medicine, arts and crafts, and other purposes. Continued ability to access and use these resources must be assured.</u> Resources used include (and are not limited to) the many edible berries (blueberries, huckleberries, elderberries, high and low bush cranberries, lingonberries, cloudberries), devil's club, Labrador tea, various leaves, branches &amp; barks &amp; roots such as red and yellow cedar wood, red &amp; yellow cedar bark, alder wood, spruce wood and roots.</p> <p>Similar themes are found in SOCs: CULT 6, MAN 6-A, SUB 3-A, TIM 9-A</p>
SUB 3-B	<p><u>Southeast Alaskans need reliable access to the foods we grew up on.</u> Consider needs of people who live here before big business.</p>
SUB 3-C	<p><u>Due to rising energy costs and fuel prices, the Forest Plan should note the increased importance of subsistence foods and of customary and traditional uses of forest resources,</u> particularly salmon and deer. Simultaneously, the State has taken positions that are hostile to sustainable Federal management of Tongass resources, including subsistence resources. The Plan has to change to reflect these new realities and protect subsistence rights.</p> <p>Similar themes are found in SOCs: ENER 1-G, ENER 2-A&amp;B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&amp;E, SOCIO 2-A, SOCIO 2-P, SUB 3-C</p>
SUB 3-D	<p><u>Implementation of current Forest Plan will harm the subsistence lifestyle.</u></p>
SUB 3-E	<p><u>Significant timber harvest has occurred on a combination of USFS and Native Corporation land on north Kupreanof and north Kuiu Islands; leave the remaining wild areas here alone to protect subsistence.</u></p>

SUB 3-F	<u>Population monitoring for subsistence-utilized species is critical to communities</u> , especially in areas of extensive timber harvesting and road building. The loss of habitat, accessibility for predation, hunter and recreation impacts have strained local populations used for subsistence.
SUB 3-G	<u>Rising energy costs require giving more attention to making ample firewood available for subsistence gathering of it to heat homes.</u> This is needed more than opening up large stands of old growth to clear cutting, and promoting a wood pellet industry in Southeast Alaska.
SUB 3-H	<u>Fishing, tourism, and subsistence are far more important to the communities of Southeast Alaska and to the nation at large than timber.</u>
SUB 3-I	The Forest Plan should <u>update subsistence usage statistics.</u>

## 4.23 TERRESTRIAL HABITAT – DEER (TERR 1)

Comments about the management of habitat, habitat requirements; or potential impacts to habitat for deer; also about species population/abundance; or deer as prey species for wolves.

### 4.23.1 Comment Analysis

A total of 43 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, Alaska Wilderness League, Cascadia Wildlands, Defenders of Wildlife, Earthjustice, League of Conservation Voters, National Audubon Society, Natural Resources Defense Council, Sierra Club, Southeast Alaska Conservation Council, Trout Unlimited, the US Fish and Wildlife Service, and the US Forest Service. Comments were also expressed at the Craig, Juneau, Ketchikan and Petersburg public meetings, and by unaffiliated individuals. No comments on this topic were submitted by form letter.

Over 75% of the comments addressed SOC TERR 1-A, expressing concern that the existing forest plan (including the wildlife conservation strategy), its implementation, and monitoring has not provided effective protection for deer populations, particularly due to the levels of old growth clearcut logging and harvest in deer winter range. The other SOCs in this topic received from one to six comments.

### 4.23.2 Statements of Concern

TERR 1-A	<p>Concern that the existing Forest Plan (including the wildlife conservation strategy), its implementation, and monitoring has <u>not provided effective protection for deer populations</u>, particularly due to the levels of old growth clearcut logging and harvest in deer winter range. Specific concerns include:</p> <ul style="list-style-type: none"><li>• Deer populations and deer habitat capability have decreased below the standards established in the Forest Plan (18 deer per square mile throughout the biogeographic province) and are projected to decline even further.</li><li>• Deer population declines raise long-term concerns for maintaining a resilient predator-prey balance (e.g., on Prince of Wales Island) and for human harvest of deer (including subsistence).</li><li>• Continued large-scale old growth timber cutting is not a viable option if we are to maintain adequate deer populations and the associated subsistence and other hunting vital to local communities.</li><li>• Protection of remaining deer winter range is important.</li></ul>
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TERR 1-B	Concern has been expressed that the <u>deer model</u> is flawed and has consistently overestimated deer carrying capacity and that more reliable modeling and population data is essential. Flawed modeling and lack of accurate population data undermines the credibility of Forest Service decisions about timber and habitat management, and of State of Alaska and Board of Game decisions about wildlife management (including predator control).
TERR 1-C	Statement that <u>logging is not a threat to wildlife habitat</u> . Deer have thrived in logged areas over the past 60+ years of logging, even in deep snow winters. Deer have been observed to use timber stands adjacent to recently logged areas, presumably due to increased sunlight, which stimulates growth of forage.
TERR 1-D	Approximately half the second growth on the Tongass is within LUDs that do not allow commercial timber harvest, or in areas otherwise unsuited to timber harvest (such as beach or riparian buffers). Where second-growth stands occur on lands important to wildlife, the USFWS recommends treatments to improve habitat function. This opportunity is particularly relevant where low elevation stands with potential to support wintering deer could be improved. Large clearcuts reduce habitat capability over most of a timber rotation. Alternatively, individual tree selections and small patch cuts may help stimulate production of deer forage while preserving canopy closure over most of the stand, to intercept snow during winter. Pruning and girdling might also be beneficial as thinning strategies if they result in accelerated growth of residual trees without producing large quantities of slash, which restricts wildlife and human movement through thinned stands. On some south-facing slopes, narrow strip cuts may be useful to provide forage along the edges of maturing second-growth.

## 4.24 TERRESTRIAL HABITAT – WOLVES (TERR 2)

Comments about management of habitat, habitat requirements, or potential impacts to habitat for wolves; also about species population/abundance.

### 4.24.1 Comment Analysis

A total of 35 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, Alaska Wilderness League, Cascadia Wildlands, Defenders of Wildlife, Earthjustice, League of Conservation Voters, National Audubon Society, Natural Resources Defense Council, Sierra Club, Southeast Alaska Conservation Council, Southeast Conference, and The Nature Conservancy. Comments were also expressed at the Juneau, Ketchikan and Petersburg public meetings, and by unaffiliated individuals. Five comments on this topic were unique substantive comments added to a form letter.

In addition to the form letters with unique comments that were included in the counts of commenters noted above, an additional 9,105 signatures/comments from one form letter campaign were submitted on Statement of Concern TERR 2-A. See the Submission Index on the last page of this document for more information.

Ninety-five percent of the comments addressed SOC TERR 2-A, expressing concern that a strong/strengthened forest plan and wildlife conservation strategy is essential to providing effective protection for the Alexander Archipelago Wolf and preventing its listing under the Endangered Species Act. SOC TERR 2-B received just two comments.

### 4.24.2 Statements of Concern

TERR 2-A	<p>Comments that a strong/strengthened Forest Plan and wildlife conservation plan is essential to providing effective protection for the <u>Alexander Archipelago Wolf</u> and preventing its listing under the Endangered Species Act.</p> <p>Specific concerns include:</p> <ul style="list-style-type: none"><li>• Declines in deer populations raise long-term concerns for maintaining a resilient predator-prey balance between wolves and deer (e.g., on Prince of Wales Island).</li><li>• Continued large-scale old growth timber cutting will not maintain adequate wolf populations.</li><li>• Lack of sufficient deer for subsistence and other human harvest leads to State-implemented predator control that further reduces wolf populations. Further, flaws in the deer model and lack of accurate deer population monitoring data and projections provided to the State of Alaska have made Board of Game decisions about wolf control</li></ul>
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	<p>questionable. The State is now killing wolves in the expectation of increasing the deer population to a number that is higher than what the habitat can really support.</p> <ul style="list-style-type: none"> <li>• The State of Alaska cannot be relied on to assure viable wolf populations. The State manages predator populations on a sustained yield principle, which is a lower threshold than the NFMA viability standard of the 1982 planning rule and the biodiversity standard of the new planning rule.</li> <li>• Hunting pressure on deer, which are essential prey for the wolf, will increase over time as Southeast Alaska's population increases.</li> <li>• Concern that declining deer populations and lack of a healthy predator-prey balance is creating a situation where wolves are coming into closer proximity with humans and property.</li> <li>• Road densities must be considered a factor in wolf viability, and a new standard established for density vis-a-vis wolf populations (see WCS-1)</li> </ul>
TERR 2-B	Statement that <u>logging is not a threat to wildlife habitat</u> . Wolves have thrived in logged areas over the past 60+ years of logging, even in deep snow winters.

## **4.25 TERRESTRIAL HABITAT – OTHER (TERR 3)**

Terrestrial habitat and wildlife comments (not related to deer and wolves).

### **4.25.1 Comment Analysis**

A total of 81 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Chapter of the Wildlife Society, Alaska Electric Light and Power, Alaska Forest Association, Alaska Power & Telephone, Alaska Wilderness League, Cascadia Wildlands, First Things First Alaska Foundation, Friends of Admiralty Island, Juneau Audubon Society, Ketchikan Chamber of Commerce, Natural Resources Defense Council, Pioneer Alaskan Fisheries, Inc., Responsible Cruising in Alaska, Sealaska Corporation, Southeast Conference, The Nature Conservancy, Trout Unlimited, and the University of Alaska Fairbanks.

Comments were submitted by Alaska State Representative Cathy Munoz and former Governor and former Senator Frank Murkowski. Comments were also submitted by the US Fish and Wildlife Agency and US Forest Service, as well as the Organized Village of Kake. Comments were also expressed at the Juneau and Ketchikan public meetings, and by unaffiliated individuals. Six comments on this topic were a unique substantive comment added to a form letter.

In addition to the form letters with unique comment that were included in the counts of commenters noted above, an additional 9,105 signatures/comments from one form letter campaign were submitted on Statement of Concern TERR 3-A. See the Submission Index on the last page of this document for more information.

Nearly 50% of the comments addressed SOC TERR 3-A, commenting that a strong/strengthened forest plan and wildlife conservation plan is essential to providing effective protection for the Queen Charlotte goshawk and preventing its listing under the Endangered Species Act. Over 15% addressed TERR 3-D, expressing general support for protection of wildlife habitat and requesting that this be a management priority over potentially conflicting uses. About 10% commented that logging is not a threat to wildlife (TERR 3-H), and nearly 10% recommended that impacts to wildlife habitat and populations be minimized to the extent feasible (TERR 3-C). The other seven SOCs had from one to four comments.

#### 4.25.2 Statements of Concern

TERR 3-A	<p>Comments that a strong/strengthened Forest Plan and wildlife conservation plan is essential to providing effective protection for the <u>Queen Charlotte goshawk</u> and preventing its listing under the Endangered Species Act. Specific concerns about goshawks include:</p> <ul style="list-style-type: none"><li>• Goshawks live in an environment with low prey abundance and natural habitat fragmentation, leading to large foraging areas. High-grading higher volume classes of forest has further fragmented the old growth forest and forced goshawks into even larger foraging territories, raising concerns about high energy expenditure for foraging, increased energetic stress, lower reproductive rates, and starvation.</li><li>• In SE Alaska, goshawks are strongly associated with moderately to very highly productive old growth forests (25,100-39,000 MBF/acre), depending upon that forest type for the prey species it provides, for nesting, to facilitate its hunting (concealment, perches, adequate flight space), and to protect it and its young from predation. Goshawks actively avoid clearcuts, non-forested areas, and mature saw timber (&gt;75 years).</li><li>• Goshawks do nest in mature second growth forest, especially where such habitat dominates the landscape. The Forest Plan must acknowledge and provide protection for this second growth habitat when nesting is occurring.</li><li>• Disproportionate logging of productive old growth forest (on Tongass and non-federal lands) has marginalized or eliminated nesting territories, likely resulting in fewer breeding pairs and population decline. Even if old growth logging were stopped on national forest lands, the population would continue to decline due to logging on non-federal land and also the time it would take for populations to adjust to the modified forest environment.</li><li>• The Forest Plan's old growth management prescription (2008 Plan, p. 3-57) sets a general goal of maintaining areas of old growth forests, but does not include a specific goal of retaining larger amounts of moderate to very high volume old growth for species that are strongly associated with these forest types, such as goshawks.</li><li>• The Tongass relies on an inaccurate assumption, that there is a linear relationship between acres of old growth forest and numbers of breeding pairs. This is not the case, due to disproportionate logging of high volume stands and high level of habitat fragmentation.</li></ul>
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	<ul style="list-style-type: none"> <li>• Data regarding productive old growth acres logged, existing, or scheduled for logging do not differentiate between volume classes, so do not accurately reflect past impacts to goshawks and their habitat and do not provide a reliable basis to predict future viability. In addition, assessments of impact and viability must consider forest fragmentation, edge effects and connectivity - all of which effect habitat value for goshawks.</li> <li>• Goshawks are particularly vulnerable because of their small population size in SE Alaska and their relative isolation from other populations. Suggested that as of 2000 the entire population in SE Alaska was no more than 300 breeding pairs, which may qualify the subspecies as threatened in SE Alaska.</li> <li>• The 2008 Forest Plan has no requirement to monitor goshawk populations or habitat.</li> <li>• The 2008 Forest Plan requirement to conduct pre-logging inventories of goshawk nesting sites (2008 plan, p. 4-99) is ineffective, as goshawks are frequently missed. Surveys provide some information and should be continued, but cannot be relied upon to inform goshawk conservation measures.</li> <li>• Goshawks are particularly at risk on Prince of Wales Island and surrounding islands (which constitute a significant portion of its range in SE Alaska), due to past logging practices on national forest and non-federal lands that has disproportionately degraded goshawk habitat, and natural lack of prey abundance and diversity.</li> <li>• A review of the goshawk Standards &amp; Guidelines is needed in relation to how to manage nests found in young growth (see General Topic of Concern, WCS 1)</li> <li>• Old Growth Reserves are not large enough to sustain a viable goshawk population. (See General Topic of Concern, WCS 2)</li> </ul>
TERR 3-B	<p>Comments that a strong/strengthened Forest Plan and wildlife conservation plan is essential to providing effective protection for the <u>Northern Flying Squirrel</u> and preventing its listing under the Endangered Species Act. Data is offered (see DATA-A) for review that recent clearcuts and second growth have less food resources, typically found in the diet of flying squirrels, in southeast Alaska. Thus squirrels that attempt to disperse through managed landscapes would likely experience greater challenges to survive.</p>
TERR 3-C	<p>Comment that Tongass management must minimize and/or mitigate adverse effects to wildlife habitat and populations <u>to the extent feasible</u>.</p>

TERR 3-D	<p>Comments expressing <u>general support for protection of wildlife habitat</u> and requesting that this be a management priority over potentially conflicting uses. Specific comments include:</p> <ul style="list-style-type: none"> <li>• Concern that the existing Forest Plan as implemented has had significant impacts on wildlife habitat.</li> <li>• Concern that past logging (on the Tongass and adjacent non-federal land) has focused on low elevation stands with the largest tress, concentrated in certain biogeographical provinces, which has disproportionately affected wildlife and habitat in these areas.</li> <li>• Recommendation that the Tongass use its authorities and resources to design and implement projects that protect and restore wildlife habitat.</li> <li>• Concern that logging has changed local predator-prey dynamics, particularly for deer, wolves and bear.</li> <li>• Foresters can create old growth conditions by identifying the vertical and horizontal structure desired within a stand.</li> </ul>
TERR 3-E	<p>Wildlife <u>species that should receive more attention</u> in the Forest Plan and its implementation include:</p> <ul style="list-style-type: none"> <li>• birds (game and non-game, migrants and residents, species listed in Alaska Audubon Watchlist and Boreal Partners in Flight Landbird Conservation Plan)</li> <li>• endemic small mammal populations</li> <li>• bear, marten and other furbearers - concern that the State manages predator populations on a sustained yield principle, which is a lower threshold than the NFMA viability standard of the 1982 planning rule and the biodiversity standard of the new planning rule</li> <li>• moose - comment that moose are impacted by winter conditions created by clearcut logging, lacking winter cover and understory browse</li> </ul>
TERR 3-F	<p><u>Continue work on eradication of invasive species</u>. A clause should be added to construction contracts that require clean equipment to avoid introducing invasive species into the Tongass.</p>
TERR 3-G	<p>Request no further old growth or young growth logging on <u>karst</u> areas to protect this type of terrestrial habitat.</p>
TERR 3-H	<p>Comments that logging is not a threat to wildlife habitat, with the following specific comments:</p> <ul style="list-style-type: none"> <li>• Bears have thrived in logged areas over the past 60+ years of logging, even in deep snow winters. Noted high concentration of bears by West</li> </ul>

	<p>Fork River because, due to timber harvest and regrowth, that is where food is located.</p> <ul style="list-style-type: none"> <li>• Young growth stands support diverse wildlife, including increased populations of song birds and small mammals that in turn support raptors and other predators.</li> <li>• Managed forest lands (such a precommercially thinned areas) can contribute to supporting wildlife populations (citing research such as PNW-RP-593) "Precommercial Thinning: Implications of Early Results from the Tongass-Wide Young-Growth Studies Experiments for Deer Habitat in Southeast Alaska".</li> </ul>
TERR 3-I	<p>There is a risk of disease transmission from domestic livestock and from pack-animals to Alaska's Dall's sheep and mountain goat populations. Musk ox may also be at risk because they are genetically related to mountain goats and Dall's sheep. There is a reasonable basis for concern regarding use of llamas and alpacas as pack animals in Dall's sheep and mountain goat habitats. There is no concern regarding the use of horses, mules, or dogs as pack animals as there is no evidence that they transmit pathogens to wild sheep or goats.</p> <ul style="list-style-type: none"> <li>• Elsewhere in North America, wild sheep populations have been severely reduced following introduction of domestic livestock pathogens, such as Pasturella bacteria that cause pneumonia. Disease introduction has mainly occurred when wild sheep have come into contact with domestic sheep and goats, which can carry a variety of pathogens without apparent illness. Treatment of livestock diseases in wild sheep is difficult and typically requires culling of sick animals or entire populations. Alaska's wild sheep and goat populations have thus far not been exposed to most livestock pathogens. Introduced pathogens could spread rapidly among Dall's sheep in particular because the animals are immunologically naive and often occur across large areas of contiguous habitat where there are few barriers to disease transmission. We know less about the potential for the spread of domestic livestock diseases among mountain goats. But, we do know they are susceptible to many of the same pathogens as wild sheep.</li> <li>• Musk ox may also be at risk because they are genetically related to mountain goats and Dall's sheep.</li> <li>• Although grazing of domestic sheep is still relatively rare in Alaska, use of domestic goats as pack animals appears to be increasing among backpackers and hunters. Domestic goats harbor many of the pathogens that have resulted in population declines among bighorn sheep in the United States and Canada. Use of domestic goats as pack animals could result in the transport of infected animals into Dall's sheep and</li> </ul>

	<p>mountain goat habitat. Pathogens introduced by even a small number of infected animals could have severe consequences for wild sheep and goat populations in Alaska.</p> <ul style="list-style-type: none"><li>• There is uncertainty regarding the potential for llamas and alpacas (camelids) to transmit livestock disease to wild sheep and goats. However, camelids can carry some of the same pathogens as domestic sheep and goats. Therefore, there is a reasonable basis for concern regarding use of llamas and alpacas as pack animals in Dall's sheep and mountain goat habitats.</li><li>• Please note that we have no concerns regarding the use of horses, mules, or dogs as pack animals as there is no evidence that they transmit pathogens to wild sheep or goats.</li></ul>
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## 4.26 TIMBER – INCREASE HARVEST AND SUPPLY (TIM 1)

Comments related to the need to increase the board feet or acres available in Tongass to harvest, including harvest levels not economically viable, not enough Annual Sale Quantity (ASQ).

### 4.26.1 Comment Analysis

A total of 59 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, Alaska Power & Telephone, Organization Inc., Prince of Wales Community Advisory Council, Resource Development Council, Sealaska Corporation, Southeast Conference, The Working Forest Group.

Comments were submitted by US Senator Lisa Murkowski, Alaska Senator Bert Stedman, and former Governor and former Senator Frank Murkowski; the State of Alaska; the City of Ketchikan, and Metlakatla Indian Community; expressed at the Ketchikan public meeting, and by unaffiliated individuals. No comments on this topic were submitted by form letter.

Over 25% percent of the comments addressed SOC TIM 1-D, providing a range of specific, detailed comments supporting increased timber harvest levels and supply from the Tongass. Over 20% addressed TIM 1-B, comments on the importance of the timber industry and of increasing the timber industry for the benefit Southeast Alaska communities and economy. The other SOCs had from two to seven comments each.

### 4.26.2 Statements of Concern

TIM 1-A	<p><u>Businesses need a steady and predictable timber supply.</u></p> <ul style="list-style-type: none"><li>• Small businesses need a steady, sustainable supply of wood in order to qualify for commercial loans.</li><li>• With an adequate long-term supply of timber, industry can make significant investments in manufacturing and quickly ramp up its operations. These investments can be made by private industry without government funding. All that is needed is an adequate supply of suitable, economic timber. Through the Forest Plan Five-Year Review, the time has come to ensure that the young growth forests are returned to the commercial forest timber base and that a reliable supply of old growth is set aside for harvest until young growth reaches maturity.</li><li>• The current plan has failed to provide the timber supply necessary for the local industry to expand or justify investment in additional infrastructure required to transition to a reliance on second growth forests as envisioned by the Forest Service.<ul style="list-style-type: none"><li>○ This is due to impacts on timber supply caused by imposition of the Roadless Rule to the Tongass, the way market demand is being determined, the design of buffers and retention areas, the inclusion of young growth stands within their boundaries, and associated restrictive standards and guidelines.</li></ul></li></ul>
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TIM 1-B	<p>Comments on the importance of the timber industry and of <u>increasing the timber industry for the benefit Southeast Alaska communities and economy</u>:</p> <ul style="list-style-type: none"> <li>• Timber is a renewable resource that can be managed in a responsible, sustainable manner for the benefit of southeast Alaskan communities. At one time, the Forest Service helped assure that communities had access to a large enough timber supply to support a sustainable forest products industry.</li> <li>• Revise the Tongass Land and Resource Management Plan in a manner that supports and revitalizes our timber and forest products industries to reverse the timber industry decline that plunged southeast Alaska communities into poverty and unemployment.</li> <li>• We need a revived timber industry; we know how to replenish the forest because we are of the forest here in Alaska.</li> <li>• Restrictions on forest lands on Prince of Wales Island would have astronomical effects to the community. Without it, hundreds of jobs will be lost in logging, trucking and more - the sawmill uses half of AP&amp;T's power and a shutdown would mean layoff's for it and other local businesses. The economy needs to grow bigger, not get smaller. It's already tough to make a living here for some. Do not make it tougher for all. More restrictions on Forest Lands, means less job opportunities for residents of Prince of Wales. Help keep Alaskan's working by opening up more timber sales.</li> <li>• Restore an annual timber sale level of 360 million board feet. This will require the agency to change how many acres and which acres are managed for timber harvesting. The sooner this is done, the sooner restoration can begin for the lost businesses and jobs in the community and the southern southeast region.</li> <li>• <u>The variety of milling and wood-based businesses on POW is critical to its diversified economy.</u> POW has one medium sized mill and a number of smaller mills on the island. Many of the people employed at these mills and those that harvest timber for the mills have families and live here year round. The multilayered benefit of these jobs contributes to nearly every school, business and community on POW. Some of these mills are actively pursuing new opportunities with young growth timber and in wood fuels to reduce dependence on old growth and fossil fuels. In addition, several of these mills produce important, high-value wood products from old growth such as wood for guitars and pianos – such wood cannot be found in many other places in the world and is therefore a unique and valuable asset for our local businesses.</li> </ul>
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TIM 1-C	<p>General comments <u>supporting increased timber harvest levels and supply from the Tongass</u>:</p> <ul style="list-style-type: none"> <li>• To be consistent with ANILCA and the TTRA, the Secretary shall, to the extent consistent with providing for the multiple use and sustained yield of all renewable forest resources, seek to provide a supply of timber from the Tongass National Forest which (1) meets the annual market demand for timber from the forest and (2) meets the annual market demand from such forest for each planning cycle.</li> <li>• Make more wood available; the Tongass grows back an average a billion board feet annually.</li> <li>• I [US Senator Lisa Murkowski] wish to express my strong hope that the US Forest Service will move to expand the allowable timber harvest in the Tongass.</li> <li>• Forests should be managed for maximum sustainable lumber production.</li> <li>• Allow logging to return to the Tongass. Trees are a renewable resource and logging will help Alaskans in countless ways.</li> <li>• Continue timber sales on Prince of Wales Island.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-I, ENER 3-B, MAN 8-C, MINE 4, TIM 1-C, TIM 1-G, TIM 4-B, TIM 5-A</p>
TIM 1-D	<p><u>Specific and detail-rich comments supporting increased timber harvest levels and supply from the Tongass</u>:</p> <ul style="list-style-type: none"> <li>• The Forest Service must honor its commitment to prepare and offer four, 10-year timber sales. These sales were intended to provide some volume assurance that would enable companies to make investments in manufacturing facilities and equipment. The volumes for each 10-year sale were to be between 15 and 20 million board feet per year for ten years (150 to 200 million board feet total). None of these timber sales have been prepared, although the Big Thorne timber sale is planned for later this year. Unfortunately, the Proposed Action alternative considered for this timber sale is less than the promised volume of 150 to 200 million board feet. This timber sale may keep the single remaining mid-size mill operating for a few more years, but it in no way represents the Forest Service honoring its commitment to engage in true multiple use management on the Tongass.</li> <li>• The Forest Service needs to honor its commitments on timber supply. It appears the ASQ after making deductions for Roadless Areas would be less than the volume projected for Expanded Lumber under Scenario 2 for 2014 (85 MMBF vs. 105 MMBF). While the Forest Service may use ASQ from previous years to make up this discrepancy, a more permanent solution to</li> </ul>

the Roadless Rule as applied to the Tongass is required.

- The Forest Service should make available at least 350 MMBF of timber annually. This level of timber harvest, which is far less than the 520 MMBF set by Congress under ANILCA, is achievable if the agency makes a suitable selection of timberlands available and maintains reasonable standards and guidelines for its timber sale program.
  - One example of such timberland selection is portrayed in Exhibits 1 and 2 of AFA's June 27, 2013 comments on the Forest Plan Five-Year Review. The example utilizes about 1.8 million acres of average, suitable timberlands. Managing these lands as envisioned by the geo-spatial timeline conservation strategy, whereby the land base is managed for all resource objectives simultaneously, takes advantage of forest dynamics and the capabilities of individual forest stands to meet varied resource objectives over time. The strategy maintains fish and wildlife habitat and increases biodiversity across the forest while also supporting a viable timber manufacturing industry. All of these outcomes would be in the public interest. Taking into consideration TNF conservation strategies, harvest levels of 350 MMBF are sustainable over the long term and match well with the needs of an integrated and competitive manufacturing industry. According to the AFA's June 27 paper, this harvest level will support up to three modern sawmills and provide the level of sawmill and forest residuals to enable the addition of a range of viable, smaller specialty plants, including biomass to bioenergy, green veneer, LVL lumber and possibly a small MDF plant. In addition, with a larger harvest level there are significantly increased opportunities for small, specialty sawmills and value-added wood product manufacturers, as well as for equipment suppliers and service groups.
- Restore a fully integrated forest products manufacturing industry in Southeast Alaska. It is essential that the forest products industry have the capability to manufacture every species, size and quality of commercial timber that is harvested in the region. Achieve this goal by providing an adequate, reliable supply of economic timber to the industry, which is at or above 350 MMBF annually. This timber sale level is readily achievable if the agency makes a suitable selection of timberlands for harvest and maintains a Triple-Bottom –Line approach to standards and guidelines for its timber sale program.
- The Regional Forester selected Alternative 6 in the 2008 Amended Forest Plan Record of Decision (ROD) to achieve an integrated timber industry. A reliable annual supply of at least 200 MMBF of economic timber would be needed from the Tongass to meet the objective to provide an opportunity to reestablish an integrated industry. None of the alternatives with an ASQ lower than the amended Forest Plan's meet that criterion. A three year supply of economic timber is also necessary to supply the flexibility each operator needs to cut for the market.
- Even if the Forest Service can provide financial assistance to jumpstart a transition to a young-growth industry, there will be a need for additional old-growth timber in volumes greater than recent Forest Service planning

seems to allow, to provide economically viable supplies of timber for high-value uses, such as musical instrument sound boards (pianos and guitars) and for uses where timber strength is vital.

- The low level of timber sales offered over the last five years confirms the Forest Service unwillingness to make available anywhere near 100 million board feet of timber annually, let alone the full 267 million board feet of timber.
- Analysis to prepare the 2008 Plan (of four timber demand scenarios, and seven alternatives evaluated in detail based on the four demand scenarios) resulted in a Selected Alternative to offer ASQ of 267 MMBF. TNF timber demand estimates published by the USFS for Fiscal Years 2008 to 2012 averaged 131 MMBF, yet, the timber volume offered from the TNF between 2008 and 2012 only averaged 44 MMBF. Further, the TNF indicated that it believed that, at least for the 10 to 15 year period following 2008, the Expanded Lumber scenario on its Derived Demand Analysis would provide adequate volume for the industry. [See Table G-2, page 2 on submission #125. Tongass National Forest sale volume necessary to supply derived demand for decked log volume and chips reported in Brackley et al. (2006).]
- When the 2008 Forest Plan was being prepared many communities and analyses supported a fully integrated manufacturing industry based on a timber harvest of about 350-360 million board feet annually. Citations, analysis and evidence supporting this include:
  - Analyses from the Forest Service, the McDowell Group, Cascade Appraisals and the AFA all agreed that a federal timber harvest level at or above 350 million board feet annually was necessary to sustain the desired manufacturing industry.
  - In 2007, the communities of Juneau, Wrangell and Ketchikan all passed resolutions in support of a harvest level of 360 million board feet, as did the State of Alaska and the Southeast Conference. Collectively, these groups represent a large majority of the residents of SE Alaska.
  - Despite this, the Forest Plan had the potential for only a 267 million board foot timber harvest annually. Further, the agency believed that, at least for the 10 to 15 year period following 2008, the Expanded Lumber scenario on its Derived Demand Analysis (See Table G-2, page 2 on submission #125) would provide adequate volume for the industry. The Forest Service's own economic analysis indicated that only about 18% of the old-growth stands selected for harvest under the Forest Plan could support economically viable timber sales. Further still, the 2008 TLMP adopted a "Timber Sale Program Adaptive Management Strategy" which had the effect of limiting the stands available for timber harvest and thereby reducing the available timber volume to a maximum of 100 million board feet on an annual basis.

TIM 1-E	<p><u>Comments supporting the Southeast Conference’s recommended geospatial timeline management approach, which will meet or exceed all environmental and social/cultural requirements of the land base while at the same time providing a sustainable level of economic activity that covers all costs related to managing the land base.</u></p> <ul style="list-style-type: none"> <li>• <u>Through this</u> integrated resource management strategy, the land base is spatially managed for all resource objectives simultaneously, in contrast with dividing the land base up into zones or reserves that are only allowed to contribute to designated objectives. This proactive approach to forest management would support a viable forest industry with profitable harvest and manufacturing levels of 300 - 400 million board feet per year, while also addressing wildlife conservation and other management objectives.</li> <li>• With a viable forest industry and the associated proactive forest management strategy, much of the current Tongass expenditures on restoration and facilities maintenance would no longer have to be funded by the taxpayers but rather could be part of the forest sector’s forest management program. This type of conservation strategy would enable the Tongass to significantly improve its contributions to the regional economy and become a net contributor to the nation’s treasury. <ul style="list-style-type: none"> <li>○ This management approach has been used successfully for over 20 years for many different land bases, including: Plum Creek Timber – 650 thousand acres, Oregon BLM – 2.5 million acres, Coastal BC – 500 thousand acres, Vancouver Island – 225 thousand acres, Manitoba – 58 million acres, North-Central BC – 1.8 million acres, Forest Alliance of BC – 37 million acres, Province of Alberta – 2.5 million acres, Province of Saskatchewan – 37 million acres, New Zealand - 30,000 acres, Peoples Republic of China - 350,000 acres, Chile - 1,000,000 acres.</li> <li>○ The approach used in the development of the alternative conservation strategies for the Tongass is an integrated resource management strategy whereby the land base is spatially managed for all resource objectives simultaneously, taking advantage of forest dynamics and the capabilities of individual forest stands across the land base to meet varied resource objectives over time. Using such an approach enables the entire land base to contribute to all objectives, in contrast with dividing the land base up into zones or reserves which are only allowed to contribute to designated objectives.</li> <li>○ In analyzing the Tongass conservation strategies, harvest levels of 350-400 million board feet per year truly are sustainable. These harvest levels match well with the requirements for a sustainable and integrated manufacturing industry which can compete both regionally and internationally. This level of harvest will support up to three modern sawmills and provide the level of sawmill and forest residuals to enable the addition of a range of viable, smaller specialty plants including biomass to bioenergy, green veneer, LVL lumber and possibly a small MDF plant.</li> <li>○ In addition, with a larger harvest level there are significantly increased opportunities for small, specialty sawmills and value-added wood product manufacturers as well as for equipment suppliers and services groups.</li> </ul> </li> </ul>
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	<ul style="list-style-type: none"> <li>○ Consider just the level of activity needed to supply a single regional logging equipment sales, rentals, parts and service shop – this would require a revenue stream of \$1.00 to \$1.25 million per month. This assumes 50% of business comes from sales, 10-15% from rentals, 25-30% from parts and 10-15% from service. In general, the mixture of business segments would provide about 20-21% gross profit. The operating expenses from a healthy operation should be 15% or less, leaving monthly earnings before interest and taxes of 5-7%. Those estimates are for an ongoing equipment shop. If we were dealing in a startup market or a market rebuilding from a regulatory recession, the majority of the volume would be from sales and rentals. Sales and rentals are low margin business segments; therefore, we would expect a need to double the sales volume in order to maintain similar gross profit dollars. Our current logging operators estimate that \$40 per thousand board feet is a reasonable equipment maintenance cost for a two or three side logging operation, harvesting timber with harvest units that are 15+ acres in size and contain at least 25 thousand board feet per acre. The cost will be much higher for a smaller logging operation or operations in poor timber or small harvest units because of the decreased productivity/efficiency. Here is the math: \$1,000,000 supplier revenue per month/\$40 per mbf = 25 MMBF per month or 300 MMBF of timber harvest annually \$1,250,000 supplier revenue per month/\$40 per mbf = 31 MMBF per month or 375 MMBF of timber harvest annually. This analysis is for a single branch office for an equipment supply and maintenance shop.</li> <li>○ The supplier analysis demonstrates that we need to significantly increase the harvest levels in SE Alaska to restore a viable, competitive timber industry. And our alternative conservation strategies show that we can readily accomplish this goal while still managing for other uses of the Tongass. Indeed, our analyses show that such an integrated industry could support over 2,000 direct jobs resulting in an economic gain of approximately \$535 million per year to the regional economy.</li> </ul> <p>Similar themes are found in SOCs: MAN 4-C, and SOC2-D</p>
TIM 1-F	<p><u>The economics of Forest Service timber sales need improvement.</u></p> <ul style="list-style-type: none"> <li>• An appraisal summary the Forest Service prepared for its shelf volume in 2011 stated that of the 53 million board feet appraised, only about 12 million board feet appraised positive. Some of the deficits can be overcome by the practice of allowing log export of up to 50% of the volume in each timber sale, however that practice will also reduce the volume available to the local mills by up to half.</li> <li>• The Forest Plan must provide economic timber sales, not just timber volume as a paper exercise. Scheduling an economically deficient timber sale for a peak timber market period is not a solution. In the marketplace, the mills must operate through all market cycles, and consequently all the timber sales must offer an opportunity for profit. Timber sales must consider both the actual timberlands selected for harvest and the standards and guidelines that guide harvest.</li> <li>• The Forest Service has been unable to implement even a third of the timber sale projects over the last five years, despite the efforts of many hardworking</li> </ul>

	<p>individuals.</p> <ul style="list-style-type: none"> <li>• The Forest Service should allow wood products industries to develop near the wood resources they need.</li> </ul>
TIM 1-G	<p><u>The TNF is overly protective of IRAs and conservation goals to the detriment of other forest uses such that the agency is violating governing laws that require a more balanced approach to multiple use management.</u></p> <ul style="list-style-type: none"> <li>• For example, the 2008 Forest Plan EIS indicates that 91% of the old growth timber on the Tongass is in reserves and only 9% is available for timber sales. And, much of the 9% is subject to costly partial cutting guidelines that raise the cost of harvesting while simultaneously diminishing the growth potential for those lands. The 9% is also disproportionately low-volume timber and a disproportionate amount is at higher than average elevation. Both of these characteristics increase the cost of harvesting the timber. The low-volume, high-elevation timber is also significantly lower quality and less valuable than the average timberland on the Tongass.</li> <li>• There is simply not enough economic timber available for selection. Although the Forest Service set aside 9% of the Tongass to be managed for timber, part of that is in old growth reserves; part of it is in buffers; and part of it is protected by the matrix. Of the available timber, half is young growth that still is not mature; and the other half is high elevation timber on steep hillsides with high operating costs and lower value.</li> <li>• The promise of the 2008 Forest Plan has not been realized. Parts are the plan, such as the conservation strategy, has been strictly adhered to while the timber development plan has not been executed.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-I, ENER 3-B, MAN 8-C, MINE 4, TIM 1-C, TIM 1-G, TIM 4-B, TIM 5-A</p>
TIM 1-H	<p>Every significant timber sale the Forest Service has attempted to make since the adoption of the 2008 Amended Forest Plan has been litigated. <u>This litigation has caused annual Forest Service sales to be reduced to 30-40 MMBF, not nearly enough to supply the industry.</u> Such litigation has been a relentless attack on Alaskan families and jobs.</p> <p>Similar themes are found in SOCs: MAN 2-T, TIM 1-H, TIM 4-G</p>

TIM 1-I	<p><u>Administrative modifications should be made to the roadless rule to increase the timber supply. Comments noted that moving less than 4% of inventoried roadless protected zones back into the timber base would not only allow the TNF to meet the requirements of the current 2008 Forest Plan (to sell 153 to 167 MMBF a year), but would also to increase harvest levels to allow an integrated, economically viable old-growth industry to survive until the transition can occur to a young-growth industry. Even with this modification, it would still be possible to protect much of the 537,451 acres of large old-growth timber (the volume class 6 and 7 stands) that remain in the Tongass, especially since 437,131 acres of such trees (81%) are already protected in conservation areas.</u></p>
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## 4.27 TIMBER – REDUCE HARVEST (TIM 2)

Comments about the need to reduce board feet or acres available in Tongass to harvest, including reducing old growth cut or clear-cutting, smaller ASQ; scale needs to be reduced and transition to young growth framework.

### 4.27.1 Comment Analysis

A total of 80 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Audubon Society, Alaska Wilderness League, Defenders of Wildlife, Earthjustice, Juneau Audubon Society, Latitude Adventures, Inc., League of Conservation Voters, National Audubon Society, Natural Resources Defense Council, Pioneer Alaskan Fisheries, Inc., Responsible Cruising in Alaska, Sierra Club, Sitka Conservation Society, and Trout Unlimited., and were presented at the Petersburg public meeting. Comments were also submitted by unaffiliated individuals. Twelve comments on this topic were unique substantive comments added to a form letter.

In addition to the form letters with unique comments that were included in the counts of commenters noted above, an additional 74,684 signatures/comments from two form letter campaigns were submitted on Statement of Concern TIM 2-A. See the Submission Index on the last page of this document for more information.

About 65% percent of the comments addressed SOC TIM 2-A, offering comments and suggested about reducing timber harvest generally and old-growth logging. The balance of comments addressed TIM 2-B, asking that old-growth logging be ceased on the Tongass.

### 4.27.2 Statements of Concern

TIM 2-A	<p>Comments about reducing timber harvest and old growth logging. Specific comments include:</p> <ul style="list-style-type: none"><li>• Shift away from old-growth timber sales on the Tongass</li><li>• Focus on locally owned, small and micro sales, and value added processing</li><li>• Focus on small cuts in second growth by local companies</li><li>• Create economic incentives with a smaller scale industry</li><li>• Halt old growth timber sale schedule immediately</li><li>• Within five years of a Forest Plan amendment, eliminate old growth logging beyond the small portion used by local, small-scale specialty product manufacturers</li><li>• Allowable Sale Quantity should be lowered</li><li>• Concern that past high grading has disproportionately targeted old growth</li></ul>
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	<p>forests for harvest in some areas (e.g., Prince of Wales Island)</p> <ul style="list-style-type: none"> <li>• Concern that the Tongass has prepared or is preparing sufficient volume for another approximately 25 years of old growth logging (130 MMBF under contract, 600 MMBF in 5-year sale schedule, and three planning teams devoted to planning old growth sales). This course of action perpetuates the current timber industry and will have significant impacts on fish and wildlife habitat, increase the need for watershed-scale restoration, and strengthen arguments for species listing pursuant to the ESA.</li> <li>• Need to reduce harvest and focus instead on protecting fish and wildlife habitat</li> <li>• Replant and manage areas already logged to treat timber as a sustainable resource</li> <li>• The State Mental Health Trust harvest on Wrangell Island took only a few logs but slash was left as an eyesore, and no forethought went into wind shear of trees on neighboring property, or that the wood cut on steep hillsides would come down on the highway below. It left a large footprint by not following conservation practices. This was logging at its worst.</li> <li>• The 2008 Forest Plan was based on a theoretical need for an integrated wood industry; that need is gone.</li> </ul>
TIM 2-B	<p>Comments requesting cessation of old growth timber harvest:</p> <ul style="list-style-type: none"> <li>• End all old growth harvest on an industrial scale, to protect old growth forests and the fish and wildlife that depend on them</li> <li>• No commercial harvest on entire Tongass National Forest</li> <li>• Cease old growth harvest in the following areas: <ul style="list-style-type: none"> <li>○ around Point Baker and Port Protection, noting heavy past harvest</li> <li>○ around Kake and northern Kuiu Islands, noting heavy past harvest and importance for subsistence</li> <li>○ central Prince of Wales Island, noting past heavy harvest</li> <li>○ on Mitkof Island, to bring deer populations back</li> <li>○ on Lindenberg Peninsula, noting past heavy harvest and to bring deer populations back</li> <li>○ proposed sale areas near Security Bay, needed to sustain biodiversity on Tongass</li> <li>○ uncut forest on Wrangell Island, needed to sustain biodiversity on Tongass</li> </ul> </li> </ul>

## 4.28 TIMBER – YOUNG GROWTH (TIM 3)

Comments about young growth/second growth, the young growth strategy, the transition framework to young growth-based /second growth based harvesting, the supply of young growth, how long it will take or the rate of change before young growth can be economically harvested, and management of previously harvested forest.

### 4.28.1 Comment Analysis

A total of 40 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, Alaska Wilderness League, Cascadia Wildlands, Defenders of Wildlife, Earthjustice, Klawock Heenya Corporation, League of Conservation Voters, Natural Resources Defense Council, Pacific Fishing, Inc., Prince of Wales Island Advisory Committee, Resource Development Council, Sealaska Corporation, Sierra Club, Southeast Alaska Conservation Council, and the University of Alaska Fairbanks. Comments were also submitted by unaffiliated individuals. One comment on this topic was submitted by form letter.

Comments were submitted by US Senator Lisa Murkowski, Alaska State Senator Bert Stedman, and Alaska State Representative Peggy Wilson. The State of Alaska submitted comments, as did the City of Craig. Comments were expressed during the Ketchikan and Petersburg public meetings.

Over 40% percent of the comments addressed TIM 3-A, supporting the transition to young growth managed for timber and other forest uses. However, over 30% addressed TIM 3-B, expressing concerns about the feasibility of implementing a young growth program on the Tongass. The remaining five SOCs in this topic area had one to six comments each.

### 4.28.2 Statements of Concern

TIM 3-A	<p><u>Support the transition to young growth management for timber and other forest uses.</u> Comments include:</p> <ul style="list-style-type: none"><li>• As rapidly as possible, phase out the existing large-scale old growth logging program, which on the Tongass has averaged 27 MMBF over the last six years. Eliminate within five years this old-growth program beyond the small portion used by local, small-scale specialty product manufacturers.</li><li>• As necessary, exercise authority under 16 U.S.C. § 1604(m)(2) to harvest stands prior to their reaching the culmination of mean annual increment (CMAI) requirement of the National Forest Management Act (NFMA). The agency has wide discretion to waive CMAI with "consideration...to the multiple uses of the forest", which is applicable to the transition to young growth harvest.</li></ul>
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	<ul style="list-style-type: none"> <li>• Evaluate which young growth stands should be allowed to return to old growth and how to best accomplish that.</li> <li>• Young growth harvest should focus on restoration and forest stewardship, to support ecological, community, and economic health</li> <li>• Implement treatments that would expedite the development of young growth into suitable dispersal or breeding habitat for wildlife, especially in areas where new science indicates old growth elements are not functionally connected or insufficient habitat exists.</li> <li>• Provide additional protections for areas of high value for salmon, wildlife, and other non-logging uses, particularly on Prince of Wales Island, where past logging has diminished deer habitat and stressed rare species.</li> <li>• Markets for young growth need to be developed.</li> <li>• Within the existing suitable land base, sufficient second growth already exists to completely replace existing old growth logging, were that the desired outcome, although this might require an exception to the CMAI requirement.</li> <li>• The agency can work out over time, as it implements a transition amendment, just how to apply silviculture to second growth and whether to revisit existing Land Use Designations in order to do so, rather than addressing those issues in detail now.</li> <li>• Timber harvest can be done in a way that will build a regenerative natural system, with habitat values.</li> <li>• Opportunities for intensive management of second growth timber lands should occur in a timelier manner.</li> </ul>
TIM 3-B	<p><u>Concerns about implementation of a young growth timber program.</u> Comments include:</p> <ul style="list-style-type: none"> <li>• Concern that it is unrealistic to expect a significant young-growth transition to begin within the next 20 to 30 years, due to limited supply of stands of suitable harvest age; statement that volume estimates of young growth stands are overestimated by as much as 37%.</li> <li>• Harvesting these young growth stands now, before the stands reach their maximum growth potential as some have been proposing, makes no economic sense and is a slap in the face to the American public. American taxpayers will be harmed by such action and, since the agency expects that most of the volume from these early harvests will have to be exported to be commercially viable, the local mills will derive no benefit.</li> <li>• More work needs to be done on a Young Growth Strategy and program,</li> </ul>

	<p>including development of Forest-Wide Standards &amp; Guidelines and wildlife conservation strategy elements relevant to young growth.</p> <ul style="list-style-type: none"> <li>• Concern about too rapid of a transition to young growth harvest.</li> <li>• There is insufficient second growth timber that meets the definition of culmination of mean annual increment (CMAI) required by the National Forest Management Act. USFS should delay transition to young growth to allow second growth stands to achieve CMAI.</li> </ul>
TIM 3-C	<p>Concern that <u>old growth logging is unnecessarily being perpetuated as a required "bridge" to a young growth program</u>. There are many variables that will dictate whether young growth logging will make sense in the future and the existence of infrastructure/labor associated with past old growth logging will not be a determinant.</p>
TIM 3-D	<p><u>It will be necessary to offer old growth and young growth sales in the region to successfully bridge the transition to young growth in the future</u>. Transition volume of old growth is needed to support existing mills, while young growth volume will encourage a gradual transition to reliance on second growth stands for a timber supply. Specific comments include:</p> <ul style="list-style-type: none"> <li>• In the interim, allow economic old growth timber to be harvested in the Inventoried Roadless Areas (IRAs) in a volume sufficient to meet market demand for an integrated timber industry.</li> <li>• A 350 to 400 million board foot harvest level in mature young-growth (about 90 to 100-years of age) can be sustained on about 1.0 to 1.8 million acres of commercial timberland. However, there are currently only about 430,000 acres of young-growth on the Tongass. Consequently, we need to continue harvesting old-growth timber and converting those timberlands to fast-growing young trees until we have sufficient, mature young growth to sustain a 350 to 400 million board foot harvesting and manufacturing level.</li> <li>• A sustainable plan of timber harvest using old growth reserves should be implemented until second growth can be integrated into the timber harvest rotation.</li> <li>• Continued export of timber for which there is no current local market should be allowed, the need to export should decline as new investments and the transition proceeds so that local communities can derive the benefits associated with expanded timber harvest and local processing of logs.</li> <li>• When planning, anticipate and identify the sale of young growth to coincide with commercial thinning or final harvest of mature stands. This knowledge is needed by the industry to make investment decisions about scheduling and installation of new infrastructure designed to process young growth.</li> </ul>

TIM 3-E	<u>All previously harvested acreage on the Tongass should now be included in the timber base.</u> All young growth should be actively managed for timber.
TIM 3-F	<u>Active forest management in young growth stands, in an integrated forest sector context, can mitigate the stem-exclusion stage.</u> The concern about the stem-exclusion stage of young-growth stands is exaggerated. This condition exists primarily in gently sloping areas, which comprise only about a third of the commercial timberland. Even where the condition develops, the stem-exclusion stage does not usually begin until about age 30 and typically ends at about age 70.
TIM 3-G	<u>Recommend beach logging along beaches that are not traditional scenic corridors. This will open up second growth volume.</u> Noted that this would generally be the oldest second growth on the forest, since that is where logging was initially done.

## 4.29 TIMBER – SALES (TIM 4)

Comments about specific timber sales (e.g. Wrangell 10-year sale, Big Thorne sale, etc).

### 4.29.1 Comment Analysis

A total of 29 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Audubon Society, Alaska Forest Association, Cascadia Wildlands, Natural Resources Defense Council, Resource Development Council, Southeast Conference, and Trout Unlimited. Comments were also submitted by unaffiliated individuals. Comments were also submitted by the US Fish and Wildlife Service and the State of Alaska. Comments were expressed during the Wrangell public meeting. Five comments on this topic were unique substantive additions to a form letter.

In addition to the form letters with unique comments that were included in the counts of commenters noted above, an additional 37,342 signatures/comments from one form letter campaigns were submitted on Statement of Concern TIM 4-A. See the Submission Index on the last page of this document for more information.

Over 40% percent of the comments addressed TIM 4-A, expressing concern that too much timber is being offered in old growth timber sales. In contrast, 25% addressed TIM 4-B, commenting about the lack of economically viable timber sales, questions about whether it is intentional, and about the need to follow through on the four 10-year timber sales. The remaining five SOCs in this topic area had one to two comments each.

### 4.29.2 Statements of Concern

TIM 4-A	<p><u>General comments about too much timber sales/ old growth harvest:</u></p> <ul style="list-style-type: none"> <li>Alarm expressed that the TNF has announced a number of large old-growth logging sales over the next five years.</li> <li>Revise the 5-year Timber Sale schedule and redirect resources to projects designed to promote the fishing and tourism industries.</li> </ul>
TIM 4-B	<p><u>Comments about the lack of economically viable timber sales, questions about whether it is intentional, and about the need to follow through on the four 10-year timber sales</u></p> <ul style="list-style-type: none"> <li>Many areas the Forest Service selected for harvest under the 2008 plan were steep, high elevation slopes where it costs more than double to log. In the past the Forest Service would balance high-cost harvest areas with lower-cost areas, and the result would be an economic mix of timber stands. <u>The 2008 Forest Plan has insufficient lower-cost timber harvest areas to balance against the high-cost timber harvest areas. As a result, the TNF has been challenged in</u></li> </ul>

	<p><u>implementing its timber sale program, and it has failed, as expected.</u></p> <ul style="list-style-type: none"> <li>• <u>The Forest Service is failing on its 2008 promise to prepare four 10-year timber sales. The TNF must prepare the four 10-year sales as promised.</u> These sales were intended to provide a stable volume of timber that would justify investments in manufacturing facilities and equipment. The target volumes were estimated at 15 to 20 MMBF annually for ten years (150 to 200 MMBF total). Although the Big Thorne timber sale is planned for later this year, no other sales have been prepared.</li> <li>• <u>The degree of underperformance [with respect to approving sales of old growth acres for harvest] is so extreme that it appears attributable to intentional management of the Tongass in favor of non-consumptive multiple uses, and against sustainable uses of renewable forest resources like timber.</u> For example, the 2008 Forest Plan identified over 16,000 acres of commercial old-growth available for harvest in the Tonka VCUs, whereas the Agency’s TetraTech analysis indicated that only about 6,000 acres of the old growth in the area would be economic. In fact, only 2,085 acres of economic timber is approved for harvest now despite the severe timber shortage in the region.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-I, ENER 3-B, MAN 8-C, MINE 4, TIM 1-C, TIM 1-G, TIM 4-B, TIM 5-A</p>
TIM 4-C	<p>Comments regarding the Big Thorne timber sale:</p> <ul style="list-style-type: none"> <li>• The USFWS noted in its comments <u>on the proposed Big Thorne timber sale that in some parts of the Tongass deer populations are already below standards established in the Forest Plan.</u></li> <li>• The proposed Sealaska legislation currently pending in Congress and the <u>proposed Big Thorne sale would both exacerbate the [old growth] high grading and the impacts to wildlife on the [POW] island.</u></li> </ul>
TIM 4-D	<p><u>Survey and inventory work that must be completed, or completed more thoroughly, before timber sale decisions are made:</u></p> <ul style="list-style-type: none"> <li>• <u>Clarify that streams in areas proposed for timber harvest should be thoroughly surveyed before timber sale decisions are made.</u> <ul style="list-style-type: none"> <li>○ Waiting until after NEPA analysis to survey for streams is a bad practice that should be corrected.</li> <li>○ Among the problems, depending on the timing, late-discovered streams may not be able to be adequately surveyed for fish, and, this negatively impacts the timber sale purchaser and economics because units with streams in them are harder to design and stream buffers reduce the available timber volume.</li> <li>○ For example, on the recent Tonka sale dozens of streams were discovered when the units were actually laid out.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• <u>The pre-logging surveys, or inventories, done to determine whether goshawks</u> may be occupying an area scheduled for logging are often ineffective. As the TNF has noted, “goshawks are frequently missed during surveys due to their secretive nature, low density, and use of old-growth habitats where they are difficult to detect (Flatten et al. 2001, Boyce et al. 2005, Northern Goshawks on the Tongass National Forest presented at the Tongass Conservation Strategy Review Workshop 2006.” [2008 Plan FEIS, p. 3-226].) Thus, while surveys provide some information and for that reason should be continued, they cannot be relied upon to inform goshawk conservation measures.</li> </ul>
TIM 4-E	<u>Until litigation over the Logjam timber sale occurred, there was no interagency process happening at all [regarding wolves].</u>
TIM 4-F	<u>The Wrangell Island 10 Year Timber Project should follow the Forest Plan as it is.</u> Do not incorporate plan amendments into this project. The DEIS is expected in late spring or early summer. Only governmental agencies and formal cooperators can be on the IDT.
TIM 4-G	Non-governmental organizations continue to <u>litigate every timber sale in a relentless attack on Alaskan families and jobs.</u> The USFS and USDA have authority to reverse the primary cause of decline in timber supply, the "Roadless Rule."  Similar themes are found in SOCs: MAN 2-T, TIM 1-H, TIM 4-G
TIM 4-H	<u>For several reasons caution must be exercised on efforts to modify Reserves (e.g., Big Thorne, Wrangell Island, and Saddle Lakes timber sales) by moving them into Inventoried Roadless Areas, which are now off limits to timber harvest and road construction.</u> <ul style="list-style-type: none"> <li>• Since inception of the Conservation Strategy, Reserves have been strategically designed to incorporate habitat important to sensitive, forest-dependent species. Site-specific factors, which are specifically named in Appendix D of the FEIS, have been incorporated into the Reserves to help meet multiple biodiversity and wildlife habitat objectives. These factors include the largest remaining blocks of contiguous old growth in each watershed, rare plant associations, some of the Forest's highest volume timber stands, known or suspected goshawk and murrelet nests, and important deer winter range (FEIS, pp. D-7 to D-8).</li> <li>• Location, clearly, is at least as critical as the size of each Reserve.</li> </ul>
TIM 4-I	<u>Can a sale be approved with the potential for Stewardship contracting or not, and give that choice to the District based on community needs?</u>

## 4.30 TIMBER – DEMAND (TIM 5)

Comments related to the market demand for timber that the USFS should provide, or is required to provide, under the Tongass Timber Reform Act, or other reasons. Also, comments about problems with how USFS/Tongass is calculating timber demand and the timber market.

### 4.30.1 Comment Analysis

A total of 13 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, Sealaska Corporation, Southeast Alaska Conservation Council, and Southeast Conference, and comment presented at the Petersburg public meeting. Comments were also submitted by unaffiliated individuals. Comments were also submitted by US Senator Lisa Murkowski, former Governor and former Senator Frank Murkowski, and by the State of Alaska. No comments on this topic were submitted by form letter.

A third of the comments addressed TIM 5-A, stating that the Tongass Timber Reform Act (TTRA) requires timber supply to meet market demand, and demand-based timber supply commitments made in the 2008 Forest Plan are not being achieved. A third addressed TIM 5-B, providing a range of comments about the relationship between the need to sell timber to meet market demand, and Southeast Alaska communities. The remaining four SOCs in this topic area had one comment each.

### 4.30.2 Statements of Concern

TIM 5-A	<p><u>The TTRA requires timber supply to meet market demand, and demand-based timber supply commitments made in the 2008 Forest Plan are not being achieved.</u></p> <ul style="list-style-type: none"><li>• Section 101 of the TTRA requires that, "the Secretary shall, to the extent consistent with providing for the multiple use and sustained yield of all renewable forest resources, seek to provide a supply of timber from the TNF which (1) <u>meets the annual market demand for timber from the forest and (2) meets the annual market demand from such forest for each planning cycle.</u>"</li><li>• The current plan has failed to provide the timber supply necessary for the local industry to expand or justify investment in additional infrastructure required to transition to a reliance on second growth forests as envisioned by the Forest Service. This is due to impacts on timber supply caused by the imposition of the Roadless Rule to the Tongass, <u>the way market demand is being determined</u>, the design of buffers and retention areas, the inclusion of young growth stands within their boundaries, and associated restrictive standards and guidelines.</li></ul> <p>Similar themes are found in SOCs: ENER 1-I, ENER 3-B, MAN 8-C, MINE 4, TIM 1-C, TIM 1-G, TIM 1-D, TIM 4-B, TIM 5-A</p>
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TIM 5-B	<p>Comments about <u>relationship between the need to sell timber annually to meet market demand and Southeast Alaska communities</u>:</p> <ul style="list-style-type: none"> <li>• The USFS should annually offer for sale a volume of economic timber from the Tongass at least equal to their own annual timber demand estimates. Such stability in supply would actually allow jobs, families, and communities to grow instead of decrease.</li> <li>• The State is concerned about the disproportionate socioeconomic impacts to southeast Alaskan communities from the lack of a sufficient supply of economic timber from the TNF.</li> <li>• The 1999 Forest Plan approved to implement the TTRA, anticipated a harvest of between 153 and 187 MMBF, with the Forest Service being required to "seek to meet" the demand for then existing mills for wood fiber. This did not happen and as a result the region lost 5000 timber jobs including pulp mills, a hemlock mill, large sawmills, a veneer plant, sort yards, logging and road building jobs, reducing the industry's contribution to the economy by more than \$450 million. Given the rebound in global demand for Tongass timber, a significant number of those job losses are unnecessary from an environmental or economic standpoint.</li> </ul>
TIM 5-C	<p>Comments about Tongass timber sale procedures <u>systematically overestimating market demand</u>:</p> <ul style="list-style-type: none"> <li>• Systematic overestimation of annual demand and demand over the life of the Tongass Plan results in giving timber an unfair precedence over other forest uses, fails to balance fairly the competing uses of forest resources, and wastes taxpayer dollars.</li> <li>• Procedures adopted to implement the "market demand" provisions of the TTRA – the "Morse methodology" – result in over-inflated demand projections because it focuses on installed mill capacity instead of locally derived demand for Tongass wood products. This prevents the Forest Service from responding to changing priorities and needs for Tongass resources.</li> <li>• Realistic demand for Tongass timber, as measured by actual logging levels since 2008, is barely 10 percent of the allowable sale quantity; just over a quarter of the volume threshold on Phase I lands.</li> <li>• Update procedures by evaluating new market information (such as SEACC's recent publication, "Buy Local: Alaskan Wood, Alaskan Jobs" and address the needs of local small-scale mills. This will help meet local demand for high value specialty wood products and enhance the economic vitality of Southeast Alaska communities.</li> </ul>

TIM 5-D	<p>Technical analysis and detailed comment about <u>the unfulfilled demand for timber not being addressed by the derived demand formulas used by the Forest Service, and, if the Forest Service wishes to transition to utilization of second growth timber it needs to expand the volume of sale offerings</u> (see comment submission #1548 Sealaska Corporation).</p> <ul style="list-style-type: none"> <li>• The current method of using a derived demand and basing the three-year supply of timber on current production runs counter to providing local industry the means to expand production to the ASQ, nor does it induce the industry to make the investments necessary to transition to utilizing young growth as the primary source of timber. Derived demand projections do not include increased sale volume in anticipation of increases in wood processing or that the timber supply needed to provide sufficient wood for the expanded production would have to have been purchased in preceding years (Final EIS, Vol. II, pg. G-9 thru G-11).</li> <li>• Inventory requirements depend on the volume expected to be processed each year and the amount of time needed to replenish inventory. Only the median range of expected timber purchases combined with the average annual pipeline volume is used to determine total timber sale requirements. However, the average additional volume needed to maintain the three-year timber supply is spread out over four years. Thus any increase in production besides reducing the available volume under contract will also result in a continued reduction in the three year timber supply. The volume sold in preceding years is controlled by how much was processed, not mill capacity, so it is unlikely the industry can accumulate sufficient volume to expand beyond that shown in the derived demand projections for limited lumber production. Increases in sale offerings due to increase production will trail the amount needed to maintain the new production levels and timber shortages will occur. This serves to discourage any existing mill to take advantage of improved or specific market opportunities, or invest in new infrastructure to efficiently process young growth timber.</li> <li>• In 2012 the Forest Service sold all the timber it offered for sale at above base rates. (2012 Annual &amp; Five Year Monitoring and Evaluation report, Page 20.) Volume offered for sale was generally consistent with the demand forecast for the Limited Lumber 2 Scenario 1. This indicates an unfulfilled demand for timber not being addressed by the derived demand formulas used by the Forest Service. If the Forest Service wishes to transition to utilization of second growth timber it needs to expand the volume of sale offerings to those projected for an Expanded Lumber Scenario 2 market as forecasted by the PNRS (ROD, pp. 33), or review existing sales to determine the local demand for timber. Derived demand calculations require many assumptions about a market that is admittedly varied and large (Final EIS, Vol. II, pp. G-11) and ignores factors affecting local demand but reflected in actual sale</li> </ul>
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	<p>activity. In the ROD the Regional Forester noted the derived demand projections changed considerably each time they were updated by the PNRS (pp. 35). Inventory volume must be expanded to reflect a higher demand level to more than the four years required to review and approve timber sales. The Forest Service must demonstrate that it can maintain this level of volume over time before investment in additional infrastructure will occur.</p> <ul style="list-style-type: none"> <li>• When planning the Forest Service needs to anticipate and identify the sale of young growth to coincide with commercial thinning or final harvest of mature stands. This knowledge is needed by the industry to make investment decisions about scheduling and installation of new infrastructure designed to process young growth. While continued export of timber for which there is no current local market should be allowed, the need to export should decline as new investments are made so local communities can derive the benefits associated with expanded timber harvest and local processing of logs.</li> </ul> <p>Additional comment submitted (at Petersburg public hearing), noting that the Southeast Alaska region is not suited to tree farming, due to cold temperatures, slow growth rate, high rate of precipitation, etc.</p>
TIM 5-E	<p><u>The Transition policy (especially coupled with RR) limits TNF discretion to meet market demand.</u> The removal of 300,000 acres of suitable timber from the Forest Plan and the Secretary’s policy to call Transition to second growth on roaded areas makes it impossible for the Forest Service to exercise its discretion to meet market demand in violation of the TTRA</p>
TIM 5-F	<p>The recently-established Southeast State Forest remains relatively small (approximately 50,000 acres) and is insufficient to replace the total volume of federal timber supply on a sustained basis.</p>

### 4.31 TIMBER – INDUSTRY CAPACITY (TIM 6)

Comments related to the need to or the ability of different parts of the timber industry to harvest and process timber; how much processing capacity exists, where is the capacity, how does it line up with where timber supply is offered, the need to retool sawmills and equipment for young growth/smaller diameter wood, and similar.

#### 4.31.1 Comment Analysis

A total of 15 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, EDC Wrangell, Resource Development Council, Sealaska Corporation, and Southeast Conference. Comments were also submitted by unaffiliated individuals. No comments on this topic were submitted by form letter. Comments were also submitted by US Senator Lisa Murkowski, Alaska State Representative Peggy Wilson, and by the State of Alaska.

Five comments addressed TIM 6-A, stating that timber sale volume (of all timber types) must be steady and predictable for bank financing and industry investment in capacity to occur. Five comments addressed TIM 6-C, with concerns about the loss of industry infrastructure and capacity, and insufficient supply from various land ownerships. The remaining two SOCs in this topic area had two to three comments each.

#### 4.31.2 Statements of Concern

TIM 6-A	<p><u>Timber sale volume (of all timber types) must be steady and predictable for bank financing and industry investment in capacity to occur.</u></p> <ul style="list-style-type: none"><li>• In the real marketplace, mills must operate through all market cycles, and consequently all the timber sales must offer an opportunity for profit.</li><li>• Timber supply disruptions do not provide a constant and reliable supply of wood to conduct viable manufacturing businesses.</li><li>• The reduced timber available to harvest on the Tongass due to the Roadless Rule does not support the harvest level needed to maintain reasonable manufacturing industries.</li><li>• The Forest Service must maintain a level of volume over time before investment in additional infrastructure will occur. Inventory volume must be expanded to reflect a higher demand level to more than the four years required to review and approve timber sales.</li><li>• When planning, anticipate and identify the sale of young growth to coincide with commercial thinning or final harvest of mature stands. This knowledge is needed by the industry to make investment decisions about scheduling and installation of new infrastructure designed to process young</li></ul>
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	growth.
TIM 6-B	<p><u>Industry capacity/needs specific to young growth:</u></p> <ul style="list-style-type: none"> <li>• The development of a young-growth industry in Southeast Alaska will require total retooling of existing sawmills or building of new mills.</li> <li>• The Forest Service may need to provide financial assistance – grants and loans -- to jump start a transition to a young-growth industry.</li> </ul>
TIM 6-C	<p><u>Concerns about Southeast Alaska’s shrinking timber industry capacity:</u></p> <ul style="list-style-type: none"> <li>• There is concern about the limited and aging infrastructure necessary for accessing and managing the resources of the TNF.</li> <li>• Two of the last three sawmills have closed their doors since the 2008 Forest Plan was approved (Pacific Log and Lumber and Silver Bay Logging) due to timber volumes averaging only 34% of the USFS’ s own annual timber demand estimates (USFS Management Reports).</li> <li>• If the existing mills in the region ever close (Viking Lumber in Klawock, Icy Straits Timber in Hoonah, or smaller mills on Prince of Wales) such as occurred in Oregon, it will not be possible to maintain the economies of scale to support timber operations on the forest or bring new operators into the region.</li> <li>• Private, University of Alaska, and Mental Health Trust lands in Southeast Alaska collectively can support less than 100 million board feet annually. The State of Alaska manages less than 2% of the timberland in Southeast, with a maximum harvest level of only 12 million board feet per year. Until a viable manufacturing industry with a reasonable economy of scale is restored, local mills will not be able to compete with log exports to regions that have an adequate economy of scale and this timber will not be available to local mills.</li> </ul>
TIM 6-D	<p><u>Needs of region’s smaller mills:</u></p> <ul style="list-style-type: none"> <li>• Small mills in Southeast Alaska's island chain need micro Forest Service timber sales spread out over a long time.</li> <li>• Smaller mills, firewood businesses etc. also qualify as part of the timber industry in Southeast Alaska; not all parts of the timber industry/businesses use large amounts of wood.</li> </ul> <p>Similar themes are found in SOCs: SOC 2-M, TIM 6-D, TIM 9-B</p>

## 4.32 TIMBER – THINNING, RESTORATION (TIM 7)

Comments related to where, when, and at what pace thinning, or pre-commercial thinning, is done; about how we invest in future stands now; about what is the desired future condition for riparian fringe, etc that are no longer development LUDs (because timber harvest is completed).

### 4.32.1 Comment Analysis

A total of 16 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Wilderness League, Cascadia Wildlands, Central Council of the Tlingit and Haida Indian Tribes of Alaska, Juneau Audubon Society, Klawock Heenya Corporation, Pacific Fishing, Inc., Prince of Wales Island Community Advisory Council, Resource Development Council, and Sealaska Corporation. Comments were also submitted by unaffiliated individuals. No comments on this topic were submitted by form letter.

Nine of the comments addressed TIM 7-C, offering a range of specific comments about restoration; seven comments addressed TIM 7-B, offering a range of specific comments about thinning.

### 4.32.2 Statements of Concern

TIM 7-A	(Note: No comments received in this Statement of Concern category.)
TIM 7-B	<p>Comments about thinning:</p> <ul style="list-style-type: none"> <li>• What is the Forest Service doing in regards to tree thinning? There seems to be a <u>significant difference between the Forest Service and Sealaska thinning process and stages</u>.</li> <li>• Some “wildlife” thinning programs cost thousands of dollars per acre <u>but lack proven results of improvement to habitat</u>.</li> <li>• <u>The TWYGS program has not provided information on vegetative response to thinning</u>; it seems only able to provide information on timber potential.</li> <li>• Efforts should be made to pre-commercial thinning.</li> <li>• Research such as PNW-RP-593 "Precommercial Thinning: Implications of Early Results From the Tongass-Wide Young-Growth Studies Experiments for Deer Habitat in Southeast Alaska" suggest that <u>managed forest lands can contribute to supporting wildlife populations in a material way</u>. Old growth forests alone need not bear the burden of providing high value wildlife habitat. The Forest Plan should be updated to include new research so that commenters can understand how and to what degree the various species rely on the TNF.</li> </ul>

	<ul style="list-style-type: none"> <li>• The Forest Plan needs to evolve in how it deals with <u>second growth treatments (i.e. thinning)</u>, to better incorporate habitat values of <u>second growth</u>. Of the over 200,000 acres that have been thinned on the Tongass, only about 1,700 acres were designed for habitat. Yet habitat is the most pressing and most likely need on most of these stands.</li> <li>• <u>The time that thinning occurs affects the volume of wood later</u>. Tables AF-2 and AF-3 of document R10-MB-725 for example, show that some stands produce more than twice the volume of wood when commercially thinned after 90 years than they produce if commercially thinned after 70 years. It appears from this table that the point of 95% CMAI occurs sometime after 80 years of growth.</li> </ul>
TIM 7-C	<p>Comments about restoration:</p> <ul style="list-style-type: none"> <li>• <u>Continue to build jobs and partnerships in forest restoration, but only if developed with strong science-based principles and frequent monitoring.</u></li> <li>• The Tongass is suffering a <u>\$100 million dollar backlog in unmet watershed restoration needs</u>, much from previous logging, and at current funding levels it will take another 50 years to address the major impacts to these watersheds.</li> <li>• The Staney Creek project is an example of something we support.</li> <li>• Continues the restoration projects on POW.</li> <li>• <u>Support for restoration projects and work with a caveat: Work on and funding for restoration projects to rehabilitate rivers, streams and riparian areas that have lost some biologic carrying capacity is important and supported by POWCAC and the POW Resource Advisory Committee, including restoration projects on the Harris River, Staney Creek, and other drainages. However, restoration is not a substitute for customary commercial, subsistence, or personal uses of the forest. POWCAC does not support the funding of restoration projects if those projects result in reduced staffing and activity levels in the USFS timber program.</u></li> <li>• Restoration efforts underway at Staney Creek, Harris River, and other sites appear to target the drainages that show the greatest need. However, very few of the approximately 1,200 watersheds on the Tongass show need for in-stream restoration. <u>There is a risk of overstating the need for and benefits from restoration projects after completion of the projects now underway. It is likely that future projects will provide ever diminishing returns on funds spent on stream systems that have marginal or negligible need for restoration.</u></li> <li>• <u>The idea of replacing the forest industry with a restoration economy is flawed.</u> The idea is to restore impacted watersheds and 'old-growth</li> </ul>

	<p>conditions across the forest, even though less than 10% of commercial forestlands have been harvested. Little today needs restoring. Fish populations in the region have increased over the past 50 years and have more than doubled in some areas, particularly in the most heavily logged watersheds. Likewise, wildlife populations are stable or increasing. Most acres have regenerated, and second-growth trees are maturing as projected.</p> <ul style="list-style-type: none"><li>• We are encouraged by seeing rehabilitation work in areas negatively affected by timber practices prior to NEPA; keep it up.</li></ul>
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### 4.33 TIMBER – SPECIAL FOREST PRODUCTS (TIM 8)

Comments related to the management of, or commercial uses of, non-timber forest products such as berries, mushrooms and other plants, bark, etc.

#### 4.33.1 Comment Analysis

Just three comments were submitted for this Topic of Concern. This included a comment submitted by the Central Council of the Tlingit and Haida Indian Tribes of Alaska, and Klawock Heenya Corporation, as well as a comment from the Craig public meeting.

Two comments were addressed in TIM 8-A and one in TIM 8-B.

#### 4.33.2 Statements of Concern

TIM 8-A	Alaska Natives use a number of different resources from the Tongass, including berries, bark, tea, blueberries, and devil's club, among others. Those resources are all renewable, seasonal, and local.
TIM 8-B	Eliminate need for Alaskan Natives to obtain Special Forest Products permits because these types of uses have minimal impact on the Forest and the bureaucratic hardship is unwarranted. (same as CULT 1)

## 4.34 TIMBER – OTHER (TIM 9)

Comments related to specific changes in timber management or harvest that do not fit one of categories above, such as selective harvest, music wood, stewardship contracting, firewood, timber salvage, Legacy Habitat, cedar, karst, other. Comments about past practices, historic harvest and legacy harvests.

### 4.34.1 Comment Analysis

A total of 43 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, Alaska Power & Telephone, Central Council of the Tlingit and Haida Indian Tribes of Alaska, Douglas Indian Association, EDC Wrangell, Friends of Admiralty Island, Natural Resources Defense Council, Pacific Fishing, Inc., Port Protection Community Association, Resource Development Council, Southeast Alaska Conservation Council, and Trout Unlimited.

Comments were also submitted by US Senator Lisa Murkowski, the Organized Village of Kake, by unaffiliated individuals, and in comments expressed at public meetings in Craig, Juneau Ketchikan, and Petersburg. No comments on this topic were submitted by form letter.

In keeping with the topic, quite a wide variety of timber management ideas are expressed. Thirty percent of the comments are under TIM 9-I, which is really just a place to collect a range and diversity of timber management ideas that each had one comment. The two SOCs with eight comments each are TIM 9-A with comments on cedar management and TIM 9-B listing management and supply issues for small mills and supporting micro-sales. The other SOCs had one to six comments each.

### 4.34.2 Statements of Concern

TIM 9-A	<p><u>Cedar is an important forest product for the Tribes of Southeast Alaska.</u> <u>Suggested management for cedar:</u></p> <ul style="list-style-type: none"><li>• The Forest Service is requested to develop a plan with the Southeast tribes to enable maximum utilization by Tribes of cedar while the product is in a useable state.</li><li>• Notify nearby IRA Tribes and public if any cedar trees will be logged so that harvest of the cedar bark can occur (best in May-and June) before trees are cut down</li><li>• Thousands of acres of yellow and red cedar are dying because of the lack of sufficient snowpack. Allow Tribes to maximize the use of a cedar tree with minimal impact.</li><li>• Enforce the set-aside of the Red Cedar stand near Kake for cultural</li></ul>
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	<p>purposes.</p> <ul style="list-style-type: none"> <li>• High grading of relatively rare and valuable cedar is occurring, chiefly for export to Japan, to lend profitability to timber sales. But, yellow cedar is not reproducing well, so this targeted harvest will leave little cedar on the Tongass.</li> <li>• Research shows that yellow cedar is declining on the Tongass, due to changing climatic conditions (lack of sufficient snow pack). Given this decline and its unknown role in the ecosystem, it is important to implement appropriate conservation and management strategies to conserve the species in the region.</li> <li>• There needs to be a fair discussion, using good information, about how much more logging is realistically sustainable on the developed land base. Logging should target, at a moderate pace, the least vulnerable types of forest – red alder, conifer second growth, wind forest, cedar dieback.</li> </ul> <p>Similar themes are found in SOCs: CULT 6, MAN 6-A, SUB 3-A, TIM 9-A</p>
TIM 9-B	<p><u>Support for the micro sale program and small mill operations/manufacturers and their needed old growth wood supply</u> which provide jobs-in-the-woods, in communities, and conserves the region’s natural resource base.</p> <ul style="list-style-type: none"> <li>• The Microsale Timber Program provides small mill operators on Prince of Wales Island with small quantities of dead or down trees near the existing road system and thus encourages local processing and the manufacture of high value-added wood products. This approach produces more job hours per tree cut and higher stumpage returns than the Forest Service’s traditional timber program.</li> <li>• By cutting at sustainable rates and creating high quality, value-added wood products, small-scale mills can enhance the economic vitality of Southeast Alaska at the same time as maintaining and strengthening the functional and interconnected old-growth ecosystem that supports our way of life by cutting at sustainable rates and creating high quality, value-added wood products.</li> <li>• The “Buy Local: Alaskan Wood, Alaskan Jobs” marketing program helps these businesses develop local markets for their wood products.</li> <li>• On Wrangell island an effort is underway to build a sustainable industry with small mills, including increased harvesting of music wood. Old growth needs protection as a rare intact ecosystem.</li> <li>• Small mills need a sustainable supply of wood to get bank financing.</li> </ul>

	<ul style="list-style-type: none"> <li>• Fix this problem: Red cedar and yellow cedar lumber has to be imported into the state for construction projects; this does not make sense when there is a local resource available.</li> <li>• Existing micro-mills producing specialty products cannot plausibly shift to second growth. The old growth wood supply needed by micro-mill operators does not threaten ecological damage to the forest and the transition goals can still be accomplished while providing their wood supply.</li> <li>• Small mills in Southeast Alaska's island chain need micro Forest Service timber sales, spread out over a long time.</li> <li>• Many small mills are doing value added harvesting for musical instruments, etc. There will be a need for additional old-growth timber in volumes greater than recent Forest Service planning seems to allow, to provide economically viable supplies of timber for high-value uses, such as musical instrument sound boards (pianos and guitars) and for uses where timber strength is vital.</li> <li>• Support a Tongass timber industry that is reliant mainly on young growth forest products and a residual small-scale old-growth industry supporting specialty mill products such as instrument wood and housing shingles.</li> </ul> <p>Similar themes are found in SOCs: SOC 2-M, TIM 6-D, TIM 9-B</p>
TIM 9-C	(Note: No comments received in this Statement of Concern category.)
TIM 9-D	<p>Documentation by commenters of <u>the history of laws affecting Tongass timber harvest, past timber harvest practices and volumes</u>:</p> <ul style="list-style-type: none"> <li>○ Our federal national forests were established under a working forest model. Unlike the national parks that were established for preservation, the national forests were established under the authority of the Organic Administration Act of 1897 to conserve water flows and to furnish a continuous supply of timber and other resources for the American people. The notion of the working forest has been with us for over a century. A working forest is one that recognizes the human component of our forest, incentivizes workforce development and local jobs, while providing opportunities to enhance wildlife habitat, recreation, and subsistence activities. A working forest provides many benefits to local communities and is a cornerstone of their economies. As our nation grew and demands on our forests increased, additional acts of Congress refined but did not supersede the Organic Act.</li> <li>○ The 1960 Multiple Use Sustained Yield Act added outdoor recreation, range, fish, and wildlife to the balance of national forest uses. The 1976 National Forest Management Act (NFMA) established a framework for Forest Planning, however, nowhere did Congress alter the fundamental mandate to balance water, timber, mining, recreation, range, fish, and wildlife. For decades, the TNF was managed as a working forest, and the Southeast Alaska economy thrived. The forest industry was one of the largest economic sectors in Alaska with 4,600</li> </ul>

	<p>jobs, mostly spread throughout the Southeast Panhandle. Large manufacturing facilities, including two major pulp mills in Sitka and Ketchikan, were major anchors of the region's economy and local tax base.</p> <ul style="list-style-type: none"> <li>○ Under the Alaska National Interest Lands Conservation Act, up to 520 million board feet (MMBF) of timber could be harvested each year, which was still under what the forest could sustain in perpetuity.</li> <li>○ However, the industry has undergone a major transformation in the past 20 years with new land withdrawals and adverse public policy decisions sharply curtailing the timber supply to local mills. Today the pulp mills are gone and there is only one medium-size sawmill remaining in the region, and it's struggling for survival.</li> <li>○ Today, only 4% of the entire TNF is available for harvest. Of the forested commercial grade timber, 6% is available for logging. Over the past 100 years, only 7% or approximately 430,000 acres of the total productive old-growth timber have been logged in the TNF. Only 15% of the highest volume stands has been harvested, while about 85% of the forest's largest old-growth remains untouched. Under the federal government's current management direction, the TNF is likely to produce little in the way of resources to support local economies.</li> <li>○ The blueprint for a timber industry in Southeast Alaska has changed dramatically since the 1950s when the Forest Service offered timber sales to attract a pulp industry to develop in the Tongass and believed that the Tongass could supply up to 1.8 billion board feet of timber yearly in a biologically sound and economically sustainable fashion. That timber is just a part of the estimated 95 billion board feet estimated at the time to lie in the 9.5 million acres of commercial forest land in the Tongass.</li> <li>○ The Alaska National Interest Lands Conservation Act in 1980 reduced that harvest target from federal lands to 450 million board feet (MMBF) a year guaranteeing \$40 million a year in subsidy to the Tongass to allow it to meet that timber harvest goal while removing/protecting 5.7 million acres of the forest land base. The 1980 act stated in Section 101 (d) that: "the act represented a proper balance between the reservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition, and thus Congress believes that the need for future legislation designating new conservation system units, new national conservation areas, or new national recreation areas has been obviated thereby." However, it took Congress just ten years to repeal the 1980 subsidy, to reduce the allowable timber harvest target to between 220 and 267 MMBF, and to add another 722,000 acres into protected status in the Tongass. In 1990, the Tongass, according to the Forest Service's own estimates, from a harvest of 471 MMBF from federal lands, produced 6,113 direct jobs contributing \$516 million to the state's economy.</li> <li>○ The Tongass reached its peak long before the Forest Service was here. We haven't been managing it well and it is time to do a better job.</li> </ul>
TIM 9-E	(Note: No comments received in this Statement of Concern category.)
TIM 9-F	<u>A review is needed of the timber sale program and land suitability to identify how much timber is in the timber base, the specific location of the suitable land base, and the economics associated with accessing and logging.</u>

- Some suggest a major plan revision (not a minor amendment) is needed to accomplish this, others suggest it will suffice to use the Forest Plan evaluation process to discuss, to conduct a peer review similar to that conducted for the wildlife conservation strategy, or to use a narrow minor amendment.
- Different commenters raise varying- and sometimes opposing- reasons why this re-analysis is needed and the elements to review:
  - The 2008 Forest Plan set aside 91% of the commercial timber areas in non-development LUDs and 9% in development LUDs. Part was in old growth reserves, part in buffers, part in the matrix. Of the available timber, half is young growth that is not mature, and the other half is either in high elevations on steep hillsides with high operating costs or in low value timber areas. Timber sales don't include significant amount of economic timber because timber selections are not optimal and there is not enough economic timber available. The Plan needs revised and must include selection of an average mix of high and low elevation, difficult and easy, and high and low value timber to support an entire timber industry.
  - High grading of old growth has already occurred. Most of the timber sales in the last 5 years had no bidders; 46% remain on the shelf; the timber industry finds the sales uneconomic. This is evidence of a failed management strategy, in a biological sense.
    - The assumption that a disproportionate amount of high volume, big tree timber has been logged is exaggerated.
    - Prior to 1976, most of the logging on the Tongass was in large drainages where the amortization of the mobilization, roads and other facilities could be minimized by removing all of the timber that was feasible in those days, not just the higher grade timber. Thus, those drainages were not high-graded, although most of the higher-elevation timber was out of reach of the logging systems in use at the time.
    - From 1976 to 1983, the Forest Service marked patch cuts and did target some of the higher volume stands in order to minimize the road amortization, which was skyrocketing as a result of the clearcut size limitations in the National Forest Management Act.
    - But from 1984 on, the agency adopted a policy of requiring the harvest of volume class stands in proportion to their natural occurrence in each watershed. Consequently, there was only a seven year period during which the Forest Service selected a disproportionate amount of higher volume stands. There never was an effort to select "big trees" – in fact, from the 1970s through the 1990s, the average log diameter from Tongass harvest was only about ten inches.
    - In 2007, the Forest Service analyzed its Forest Inventory plot data, which indicated that the percentage of large tree plots was very similar at both high and low elevation sites.
  - The 2008 Forest Plan timber suitability analysis was flawed, it ignored a consistent pattern of data and experience that reveals additional project-level falldown above the forest-wide estimates, and includes lands that are not cost efficient for timber production.

	<ul style="list-style-type: none"> <li>○ There needs to be a fair discussion, using good information, about how much more logging is realistically sustainable on the developed land base. Logging should target, at a moderate pace, the least vulnerable types of forest – red alder, conifer second growth, wind forest, cedar dieback. A reasonable and responsible level of old growth logging, coupled with logging prescriptions that address wildlife habitat concerns over the long-term, could allow the maintenance of an appropriately-scaled industry.</li> </ul>
TIM 9-G	(Note: No comments received in this Statement of Concern category.)
TIM 9-H	Comments in support of selective logging for music wood and for other very specific high quality purposes. Noting high value of music wood as a product from the Tongass National Forest.
TIM 9-I	<p>Several miscellaneous and unique comments were each offered by one commenter on a <u>variety of timber management issues</u>:</p> <ul style="list-style-type: none"> <li>• <u>Require a cost/benefit analysis for "all" projects.</u> Don't use the Gate 1 process to create projects that will not be economically viable whether a timber sale project or a recreation development site. An "implementable" timber program must go beyond the FEIS stage to actual timber sales on the ground with a sustainable target.</li> <li>• Under the Timber Sale Program Adaptive Management Strategy (TSPAMS), logging was delayed on exceptional wildlands like Neka Bay, Ushk Bay, Port Camden, East Kuiu, Port Houghton, the Back Channel, and the Cleveland Peninsula. <u>Although described as an "adaptive management approach," these lands remain in the timber base and should be removed.</u></li> <li>• The <u>Legacy discussion in the Forest Plan is vague and needs work</u></li> <li>• <u>Karst areas in the Tongass need permanent protection from logging</u> as they are easily damaged from timber harvest, including protection from second growth harvest here because consecutive harvests would cause a loss of the majority of surface soil.</li> <li>• Allow <u>wood products industries to develop near the wood resource.</u></li> <li>• <u>Southeast Alaska is a terrible place for tree farming</u> due to the cold temperatures, slow growth, high rain etc.</li> <li>• <u>Illegal tree girdling has been observed</u> in the area of 12 mile and Upper Staney Creek on Prince of Wales Island.</li> <li>• Revise the Secure Rural Schools/Timber receipts funding formula to allow a carbon credit/exchange system that could give value to standing Tongass trees for carbon sequestration. Have the monies from companies go to the local communities.</li> </ul>

- Timber is a renewable resource which needs to be harvested when the trees are at their prime. If not harvested, mature trees fall prey to the spruce bark beetles. The dead / dying trees are then dry, explosive fuel. A spark can cause huge forest fires, which cost a lot of federal money to fight. It is much wiser to harvest the timber at its proper time.
- Stewardship requires a program that preserves the genetic and biological diversity unique to old-growth forests. It is possible to re-forest previously harvested areas for future harvest and create a long-term sustainable partnership between business, government, and the environment, without sacrificing wildernesses. Tongass should remain as it is: a mature forest with pristine water and thriving animal populations, with a strong foundation of old-growth forest and the infinitely complex, irreplaceable biology that comes with it.
- Forests need not be destroyed. Industrial hemp can take the place of wood based products. 25,000 products can be made from industrial hemp (which is not marijuana) including paper, cardboard, beams and plywood. (www.hemptech.com)
- When discussing Tongass timber harvest at meetings, bring maps of the whole forest to assist in visualizing where timber harvest is and is not occurring.
- What is wrong with planting 'tree farms' for lumber?

Similar themes are found in SOCs: ECO 1-A, ENER 3-E, ENER 3-W, MAN 7-B, MAN 8-E, RR-21, SCIENCE-B, TIM 9-I

### 4.35 TIMBER – BRIDGE TIMBER, TRANSITION (TIM 10)

Specific comments about the volume and amounts of harvest of bridge timber that is needed to accomplish the May 2010 Transition policy.

#### 4.35.1 Comment Analysis

A total of 11 comments were submitted for this topic. This included comments from representatives of the following entities: Alaska Forest Association, Alaska Wilderness League, Law Offices of James F. Clark, Prince of Wales Island Advisory Committee, and Trout Unlimited. Comments were also submitted by US Senator Lisa Murkowski and former Governor and former Senator Frank Murkowski. No comments on this topic were submitted by form letter.

Over 50% of the comments addressed TIM 10-A, offering specific comments about why a sufficient annual sale quantity of old growth timber is required as a necessary bridge or transition to increased young growth harvest, and data on how much old growth is needed.

#### 4.35.2 Statements of Concern

TIM 10-A	<p>Comments about <u>why</u> a sufficient annual sale quantity of old growth timber is required as a necessary bridge or transition to increased young growth harvest, and data on <u>how much</u> old growth is needed:</p> <ul style="list-style-type: none"> <li>• The Forest Service must commit in the revised Forest Plan to <u>providing sufficient old-growth timber for a long enough period to permit private commercial-bank financing to pay for new mill equipment and to fund the expense of pioneering new markets for young-growth timber</u> – all steps vital to support an Alaska timber industry.</li> <li>• <u>Based on the report cited below, most of the forest’s young growth stands will not be ready for economic harvest for another 40-50 years.</u> And, some Tongass young growth stands will not reach an age where logging them is sensible until those stands are about 80-90 years old. <u>Sustaining the existing industry and meeting the allowable sale quantity in the existing Forest Plan necessitates including sufficient old growth in USFS timber sales until young growth stands alone can meet market demand and are ready for harvest.</u> Doing so provides local mills with wood needed to continue their operations, and time to retool for young growth wood.             <ul style="list-style-type: none"> <li>○ For example, see the May 2010 report titled “Economic Analysis of Southeast Alaska: Envisioning a Sustainable Economy with Thriving Communities” (USFS document R10-MB-725). Tables AF-2 and AF-3 of document R10-MB-725, show that some stands produce more than twice the volume of wood when commercially thinned after 90 years than they produce if commercially thinned after 70 years. It appears from this table that the point of 95 percent of mean annual increment culmination occurs sometime after 80 years of growth. The Forest Plan itself</li> </ul> </li> </ul>
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	<p>estimates that for the central part of the Tongass region, CMAI for a typically stocked stand occurs at around 100 years, assuming no pre-commercial or commercial thinning.</p> <ul style="list-style-type: none"> <li>○ There is insufficient young growth to support either the existing mill at Klawock or any other mills that might be built to add timber jobs here on POW and elsewhere in the Tongass. Based on the report cited in this paragraph, most of the forest's young growth stands will not be ready for economic harvest for another 40-50 years.</li> </ul> <ul style="list-style-type: none"> <li>● <u>Given that mills predict they will need more, not less, young-growth compared to old-growth timber to afford the transition to new processing equipment and new marketing costs, it is simply unrealistic to expect a significant young-growth transition to begin within the next 20 to 30 years. The Forest Service will have to offer substantially more than its recent average of timber and will have to actually build up a stockpile of sales so that commercial financing for a timber industry can be attained.</u> <ul style="list-style-type: none"> <li>○ While there are approximately 429,000 acres of potential second-growth timber in the Tongass, only about 149,000 of those areas are more than 40 years in age. That young growth will not be economically viable for harvest and sale until it reaches a size normally not attained until at least 70 years of age. When you consider current Forest Service harvest suitability standards, beach fringe and other leave strip standards, there will only be about 244,000 acres of young-growth ever available for harvest from federal forest lands, and there are only 65,518 acres currently suitable for harvest in the 40+ age class, according to a 2011 Forest Service planning document. That means there will only be about 10 million board feet available a year of second-growth starting in 2040 and the harvest of second-growth will not reach 70 million board feet a year until 2050.</li> </ul> </li> <li>● A 350 to 400 million board foot harvest level in mature young-growth (about 90 to 100-years of age) can be sustained on about 1.0 to 1.8 million acres of commercial timberland. However, there are currently only about 430,000 acres of young-growth on the Tongass. Consequently, we need to continue harvesting old-growth timber and converting those timberlands to fast-growing young trees until we have sufficient, mature young growth to sustain a 350 to 400 million board foot harvesting and manufacturing level. (same as TIM 3-D)</li> </ul>
TIM 10-B	<p>Comments that <u>a smaller annual sale quantity of old growth timber to bridge the transition to young growth is needed than was recently proposed by TNF.</u></p> <ul style="list-style-type: none"> <li>● If the Forest Service is to make good on its commitment to a sustainable forest for the future and transition out of old-growth logging, the ASQ of old-growth should be decreased from the 27 MMBF level to 5-10 MMBF by 2023; these remaining sales should be designed specifically to supply small, value-added specialty mills. This phase out should require the Forest Service to cut no more than 210 MMBF of old-growth bridge timber over the 10 year period. With 130 MMBF currently under contract, no more than 80 MMBF of additional sales should be offered over the next 10 years.</li> </ul>

	<p>Harvest of 610 MMBF violates the spirit of the transition.</p> <ul style="list-style-type: none"> <li>At the current rate of 27 MMBF of timber per year, assuming some decrease in old growth volume over the transition to a future harvest rate of 5-10 MMBF per year, the total volume of old-growth bridge timber needed for the transition should total no more than 210 MMBF. Because there is already about 130 MMBF of old-growth timber un-cut and under contract, the Tongass should plan no more than 80 MMBF of additional old-growth timber over the next ten years. The future Tongass timber program beyond the year 2023 should consist only of young-growth timber sales and 5-10 MMBF per year of old-growth timber sales designed to supply small, value-added specialty mills.</li> </ul>
TIM 10-C	<p><u>Comments about the need to harvest old growth timber from Inventoried Roadless Areas during the transition:</u></p> <ul style="list-style-type: none"> <li>Modify the time period of the transition from old growth to second growth to allow the bulk of second growth stands on the TNF to achieve their CMAI. In the interim allow economic old growth timber to be harvested in IRAs in a volume sufficient to meet market demand for an integrated timber industry,</li> <li>With a relatively slight revision of inventoried roadless protected zones and the removal of less than 4% of such lands, moving them back into the timber base, it would be possible to not just meet the requirements of the current 2008 TLMP, which called on the Forest Service to sell 153 to 167 MMBF a year, but to actually increase that harvest level that would permit an integrated, economically viable old-growth industry to survive until the transition can occur to a young-growth industry.</li> </ul>

## 4.36 TIMBER – TIMBER EXPORTS (TIM 11)

Comments specific to the export of timber from the Tongass National Forest.

### 4.36.1 Comment Analysis

A total of 14 comments were submitted for this topic. This included comments from representatives of the following entities: Cascadia Wildlands, Latitude Adventures, Inc., Sealaska Corporation, Southeast Alaska Conservation Council, comments at the Petersburg and Wrangell public meeting, and several unaffiliated individuals. Comments were also submitted by the City of Tenakee, No comments on this topic were submitted by form letter. Twelve of these comments opposed exporting of round logs from the Tongass, or at least a limitation on export. Two comments supported consideration of exporting round logs.

### 4.36.2 Statements of Concern

TIM 11-A	<p><u>Comments opposing export of logs from the Tongass:</u></p> <ul style="list-style-type: none"> <li>• Do not support old growth harvest to support an export industry.</li> <li>• Limit or eliminate exports of logs.</li> <li>• End the Forest Service’s new (post 2008) policy that allows Tongass mills to export up to half of the total sawlog contract volume from Tongass timber sales without local processing. This is a disincentive for local mills to retool for smaller, young growth trees.</li> <li>• Halt all export of the most valuable Tongass forest species – western red cedar and Alaska yellow cedar.</li> <li>• The Forest Service is under no obligation to seek to meet foreign demand for timber. Export markets are a means to an end only; the fact that increasing exports are necessary for profitable timber sales is a sign of a troubled industry.</li> <li>• The increasing export of Tongass timber undermines the effort to save local communities by boosting timber harvest. With more exports, the local return on investment declines.</li> </ul>
TIM 11-B	<p><u>Comments supporting log export:</u></p> <ul style="list-style-type: none"> <li>• In order for the TNF to contribute to local economies there should be a discussion that would provide for the export of unmanufactured timber products such as round logs. This would allow commenters to have a better idea of attaining various harvest alternatives when manufacture into finished and semi-finished products cannot be made due to costs that are too high and uncompetitive to meet market demands.</li> <li>• While continued export of timber for which there is no current local market should be allowed, the need to export should decline as new investments are made so local communities can derive the benefits associated with expanded timber harvest and local processing of logs.</li> </ul>

## 4.37 TNF MANAGEMENT – MONITORING & EVALUATION (MAN 1)

Comments about the Tongass National Forest Monitoring and Evaluation program.

### 4.37.1 Comment Analysis

A total of 19 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Cascadia Wildlands, Central Council Tlingit and Haida Indian Tribes of Alaska, Juneau Audubon Society, Natural Resources Defense Council, Pioneer Alaskan Fisheries Inc., and Sitka Conservation Society.

Comments were also submitted by the State of Alaska, the Organized Village of Kake, during the Craig Public Meeting, Petersburg Public Meeting and Sitka Public Meeting, and by unaffiliated individuals.

No comments on this topic were submitted by form letter.

Comments on Monitoring and Evaluation (M&E) were quite varied; almost all the SOCs for this topic had one comment each. MAN 1-C, which asks to maintain the Forest Plan’s current soil and water resources M&E plan had three comments; and MAN 1-A, about using careful science based evidence and planning, had two comments.

### 4.37.2 Statements of Concern

MAN 1-A	Use the “precautionary principle” in Forest Planning; <u>careful science based management planning is needed</u> to ensure future protection of the fish and wildlife resources of the TNF.  Continue forest restoration efforts, including the addition of jobs and partnerships, but <u>this must be coupled with strong science-based evidence and frequent monitoring</u> .
MAN 1-B	<u>Maintain the current Monitoring and Evaluation Plan for soil and water resources</u> (Forest Plan, Chapter 6, page 6-11).
MAN 1-C	The <u>Annual Monitoring and Evaluation Reports do not provide adequate information to the public</u> .
MAN 1-D	The remote sensing mapping techniques provided in the 2008 Forest Plan don’t allow for mapping plant associations across the Tongass.
MAN 1-E	<u>Scientific information needs to be current and readily available</u> for adoption into the management policy in order to effectively administer the Forest Plan.

MAN 1-F	<u>Form partnerships with Tribes to implement monitoring studies.</u> One such partnership could compare areas that were logged before and after the NEPA was passed. This data could be used to examine changes brought by the NEPA process.
MAN 1-G	<u>Water yield is not being adequately addressed in timber harvested watersheds and should be incorporated into the monitoring report and timber sales analysis.</u> This is especially important in its relation to climate change. Similar themes are found in SOCs: AQUA 2-H, MAN 1-G, MAN 7-E
MAN 1-H	<u>Use monitoring data in the Forest Plan review;</u> for example monitoring reports show that wind can destroy salmon buffers. This information should be considered in the review process.
MAN 1-I	<u>Monitoring needs to be conducted on Goshawks.</u> Pre-logging surveys are ineffective at locating Goshawk nesting sites and should not be the key indicator for Goshawk conservation measures. Goshawks have low, spread out populations and can be difficult to locate and record counts for. It is also a false assumption that the amount of Old Growth Forest provided is linearly correlated to the amount of suitable habitat for Goshawks. They prefer moderate to high volume old growth, which has historically been a target for logging, and therefore makes up a smaller percentage of total Old Growth. Furthermore, not all high volume old growth provides the same habitat quality; such are riparian buffers, beach fringes and fragmented forests that don't offer the protection provided by interior habitats. There are currently no forest-dwelling raptor designated as a MIS, and Goshawks would make a proper candidate.
MAN 1-J	<u>The monitoring conducted on species viability in the Conservation Strategy is inadequate.</u> There is insufficient population monitoring being conducted, including for the Management Indicator Species. The ADF&G hunting and trapping data that is used is a poor substitution.
MAN 1-K	<u>A wildlife habitat model needs to be decided upon.</u> Too much time is being spent evaluating wildlife habitat models and identifying information needs while continuing to eliminate habitat.
MAN 1-L	<u>What are the findings of the 5 Year Monitoring and Evaluation Report on Goshawk, Alexander Archipelago wolf and Black Bear on GMU 2 in Prince of Wales Island?</u>
MAN 1-M	<u>Continue work on eradication of invasive species.</u> A clause should be added to construction contracts to require clean equipment to avoid introducing invasive species into the Tongass.

MAN 1-N	<u>The TNF and USFWS incorrectly assume that total acres of old-growth forest, and the habitat capability of that forest, are linearly related.</u> For example, both agencies incorrectly assume that simply because the 2008 Plan reserves a certain percentage of total old-growth in the Tongass, that this will ensure sufficient goshawk habitat. This emphasis on quantity, rather than quality, is simplistic.
MAN 1-O	<u>Increase monitoring on the effectiveness of the conservation strategy and wildlife standards and guidelines in relationship to timber harvesting.</u>
MAN 1-P	<u>Monitoring at the project-scale should be a priority,</u> to complement the monitoring already happening at the Forest-wide scale.

## **4.38 TNF MANAGEMENT – PROCESS/TYPE OF CHANGE (MAN 2)**

Comments regarding the 5-year Forest Plan review (including the type of plan change needed), National Planning Rule, National Environmental Policy Act, and Forest Service permitting.

### **4.38.1 Comment Analysis**

A total of 113 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power Company, Alaska Miners Association, Alaska Native Brotherhood Camp 70, Alaska Power & Telephone Company (several offices), Alaska Wilderness League, Cascadia Wildlands, Central Council Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, H & L Salvage, Juneau Audubon Society, Juneau Chamber of Commerce, Kootznoowoo, Inc. , Law Office of James F. Clark, Natural Resources Defense Council, Pacific Fishing, Inc., Prince of Wales Community Advisory Council, Prince of Wales Island Chamber of Commerce, Resource Development Council, Sealaska Corporation, Southeast Conference, Sitka Conservation Society, Sitka Economic Development Association, Southeast Alaska Power Agency, The Nature Conservancy, Trout Unlimited, United Southeast Alaska Gillnetters, and University of Alaska Southeast.

Comments were also submitted by the State of Alaska, US Fish and Wildlife Service, City of Craig, City and Borough of Juneau, City of Ketchikan, Ketchikan Gateway Borough, City and Borough of Sitka, Municipality of Skagway, City and Borough of Wrangell, as well as US Senator Lisa Murkowski, Alaska State Senator Bert Stedman, Alaska State Representative Peggy Wilson, and former Governor and former Senator Frank Murkowski. Comments also came from the Ketchikan Public Meeting and Petersburg Public Meeting as well as from unaffiliated individuals.

No comments on this topic were submitted by form letter.

Almost 60% of the comments were split equally between three SOCS: MAN 2-K, urging the Forest Service to comply with Executive Orders that require federal agencies to speed up the Special Use Permit issuance process; MAN 2-B, stating that a formal plan amendment is needed as a result of changed conditions since 2008 and identifying a number of forest level analyzes that should occur due to one of those changes - application of the Roadless Rule; and MAN 2-H, asking the Chief of the Forest Service to re-delegate the authority to make permitting decisions within Inventoried Roadless Areas (IRAs) to the TNF. Another 10% each ask that a comprehensive Forest Plan revision not be done (MAN 2-C), and express concern about how public and agency comments are being considered and weighed by the Forest Service.

#### 4.38.2 Statements of Concern

MAN 2-A	<p>Many comments in support of immediate implementation of the May 2010 Transition Framework <u>recommend that the transition plan be implemented through a Forest Plan amendment, described as "narrow", "focused," "targeted" and "surgical" (rather than a completely revised or comprehensive review of the entire Forest Plan).</u></p> <ul style="list-style-type: none"> <li>• Support for the "narrow" amendment indicate that undertaking a more comprehensive Forest Plan revision would unnecessarily divert important financial and personnel resources that otherwise could be better used planning and implementing projects designed to improve fish and wildlife habitat, recreation opportunities, and other sustainable economic opportunities in Southeast Alaska communities.</li> <li>• However, some comments that favor a "narrow amendment" still point out that it must be accomplished through a full Environmental Impact Statement (EIS) process under the National Environmental Policy Act (NEPA).</li> </ul> <p>(Note: these comments are coded to MAN 9 for substance, and here to MAN 2 regarding the <u>type</u> of plan change needed.)</p>
MAN 2-B	<p>The 2008 Forest Plan must be revised through a <u>formal plan amendment, as a result of changed conditions</u> that have occurred since it was promulgated since January 2008. Changed or compelling conditions include:</p> <ul style="list-style-type: none"> <li>• Secretary of Agriculture Tom Vilsack's May 25, 2010 announcement of a transition to second growth timber on roaded areas of the Tongass shows that he has no intent to implement the timber sale program set out in the 2008 Amended TLMP.</li> <li>• The May 2010 decision to transition from the 2008 Forest Plan Timber Sale Program Adaptive Management Strategy of harvesting old-growth timber on roaded areas and low and moderate value IRAs, to harvesting young-growth timber in roaded areas. (Concern also noted that this is a violation of the National Forest Management Act due to non-compliance with the culmination of mean annual increment of growth [CMAI] requirement.)</li> <li>• The elevation of virtually all local decision-making on IRAs in the TNF to the Chief of the Forest Service has brought national politics into the decision-making process and has altered assumptions upon which the Forest Plan was promulgated in January 2008. The Forest Supervisor and district rangers had previously made decisions on such issues as issuance of a Special Use Permit in IRAs. When this change occurred, the Washington Office of the Forest Service could arbitrarily and</li> </ul>

capriciously refuse to allow a project in an IRA – even when the TNF was still exempt from the Roadless Rule.

Similar themes are found in SOCs: ENER 3-X, MAN 2-B MAN 2-H, MAN 4-E, RR-15

Application of the Roadless Rule to the Tongass. The Forest Service is recommended to conduct forest-level analysis of this change, to include, at a minimum:

- Compliance with all applicable federal laws, with specific attention to ANILCA and TTRA;
- Evaluation and determination as to whether the inventoried roadless areas provide a comparable achievement of the Old-Growth Habitat LUD goals and objectives;
- The Forest Service should analyze whether inventoried roadless areas provide a range of habitats capable of supporting viable and well distributed wildlife populations on the TNF. The inventoried roadless areas contain approximately 54 percent (2.7 million acres) of the existing productive old-growth (POG) habitat on the TNF (FEIS, page 3-449), while the Wilderness and Wilderness National Monument areas include an additional 1.5 million acres of old-growth habitat (FEIS, page 3-460).
- Location, area, and functional value of inventoried roadless areas where road construction occurred ("roaded roadless") during the exemption period (2003-2011);
- Determination as to whether the roaded roadless areas are "substantially altered";
- Comparative evaluation of Scenic Integrity Objectives and Visual Priority Routes in roaded versus inventoried roadless areas;
- Existing Scenic Integrity (ESI) ratings were used by the USFS to analyze the degree of intactness of the landscape character, and categorize the degree of alteration visible in the landscape. Approximately 88 percent of the TNF is rated as a Very High ESI, which is a visually unaltered condition, and about 10 percent of the land is rated as Low, Very Low, or Unacceptably Low, which indicates noticeable development activities (FEIS, page 3-404 through 3-405). Areas where development activities are noticeable are generally outside inventoried roadless areas. As such, the scenic values of the TNF may be accommodated by the Roadless Rule.
- Evaluation of landscape connectivity, with specific attention to the Beach and Estuary Fringe Forest-Wide Standards & Guidelines;
- Evaluation of the Wildlife Forest-Wide Standards & Guidelines, with specific attention on the legacy and road density provisions;
- Evaluation of whether the Wildlife Conservation Strategy is now too conservative and restrictive, given the areas that are now off limits to development under the Roadless Rule, and
- Evaluation of direct and indirect effects on the access to and development of locatable, leasable, and salable mineral deposits, and renewable energy resources.

	<ul style="list-style-type: none"> <li>○ Note that in order to consolidate and list similar topics together, some of the bullets above came from comments coded to RR-23. <ul style="list-style-type: none"> <li>- Major federal policy changes related to energy and climate change. For example, the federal Administration's requirement that federal facilities be 20% reliant on renewable energy by 2020, and the emphasis on replacing fossil fuel with renewable energy resources, supports the need for a plan amendment to consider significant renewable energy development planning on the Tongass.</li> <li>- The federal government is working to reverse unemployment, stimulate economic growth, and eradicate poverty in the US. The Forest Plan needs to be amended to address conditions of poverty and high unemployment in Alaska.</li> </ul> </li> <li>● Consistent lack of offering volume of timber for sale recommended by chosen Alternative 6 of the 2008 Forest Plan, in order to provide enough timber to support an entire timber industry, including a mix of high and low elevation, difficult and easy, and high and low value timber.</li> <li>● Remedy the confused interpretation of the TUS Avoidance LUDs, using a NEPA process, to facilitate evaluation of hydropower proposals.</li> </ul>
MAN 2-C	<p>Comments recommending that a <u>comprehensive Forest Plan revision not be done</u>. Specific comments include:</p> <ul style="list-style-type: none"> <li>● A Forest Plan revision is not warranted. Since the 1997 Forest Plan revision and the 2008 Forest Plan amendment (and the various other less significant amendments), the conditions on the land and demands of the public have not changed to the point where a Forest Plan revision is warranted.</li> <li>● A major Forest Plan revision would take 4-5 years and would unnecessarily divert important financial and personnel resources that would be better used for planning and implementing projects designed to promulgate sustainable economic opportunities in fishing and tourism industries, increase recreation opportunities, improve fish and wildlife habitat, and move the transition plan forward. (This comment is also linked to MAN 2-B, which summarizes comments that support a "target and narrow" amendment to implement the Transition Framework.)</li> <li>● The current 2008 Forest Plan is working well and does not need to be redone. It allows the direction and flexibility to do what is needed on the Tongass for communities and for the conservation, protection and management of most of the resources. There is a failure in leadership in the plan's implementation, needed to effectively implement the right strategies and investments to produce resources in our current socio-economic reality.</li> <li>● The Roadless Rule does not require a Forest Plan revision, as it was promulgated before the 2008 Forest Plan Amendment and does not</li> </ul>

	<p>impact any on-going project planning or implementation. Roadless rule implementation has changed the "suitable and available" timber base, but that could be addressed through a plan update supplement or edit.</p> <ul style="list-style-type: none"> <li>• Potential land transfers on the Tongass do not require a Forest Plan revision, as none have yet occurred, and they would not be a significant change that requires plan revision due to the limited land base involved.</li> <li>• A plan amendment will open up the Tongass Land Management Plan to outside interest groups.</li> <li>• Since the Forest Plan uses the word "timber" when referencing the forest's wood resource (not "old growth" or "young growth"), a transition to young growth harvest could be addressed with a minor amendment to the Goals and Objectives.</li> <li>• Issues that are not essential to the transition goal or may be substantially affected by the amendment process should be put on hold. In particular, the Forest Service need not and should not devote near-term resources to evaluating past performance of a wildlife conservation strategy that will largely be rendered nugatory (insignificant) by implementation of the transition goal.</li> </ul>
MAN 2-D	<p>Recommend that <u>the Tongass not undertake a lengthy review of the wildlife conservation strategy, and instead use its discretion and resources to design and implement projects within the existing conservation strategy that protect and restore important fish and wildlife habitat.</u> The current conservation strategy will be essentially immaterial after the transition, as it is focused on effects of old growth logging on fish and wildlife.</p>
MAN 2-E	<p><u>Congressional action is needed to provide lasting protection for the region's most important salmon-producing watersheds,</u> such as those listed in the "Tongass 77" proposal. (See also AQUA 2-B)</p>
MAN 2-F	<p>The Tongass should <u>reassign one of its planning teams to developing a restoration pipeline</u> that will address the unmet watershed restoration needs. (See also AQUA 2-E)</p>
MAN 2-G	<p>The Tongass should reallocate significant budgetary resources toward planning and implementing <u>projects designed to support the fishing and tourism industries (and away from expenditures on forest products and roads).</u></p>
MAN 2-H	<p>The Chief of the Forest Service should <u>re-delegate to the Forest Supervisor and District Rangers on the TNF the authority to make permitting decisions within Inventoried Roadless Areas (IRAs).</u> Other opportunities to provide more control to the Forest Supervisor and District Rangers for permit issuance is also requested, including energy permitting decisions within IRAs. Similar themes are found in SOCs: ENER 3-X, MAN 2-B MAN 2-H, MAN 4-E, RR-15</p>

MAN 2-I	In Forest Planning decisions, <u>more attention should be paid to wildlife populations enjoyed for viewing, endemic small mammal populations, furbearers, sensitive plants, and birds</u> (see Alaska Audubon Watchlist and Boreal Partners in Flight Landbird Conservation Plan for Alaska Biogeographic Regions for avian species that may need extra consideration).
MAN 2-J	The five-year review process should be <u>following the new national Forest Planning rule</u> . Without those rules and guidance, the public doesn't know how its comments will affect the Forest Service's decision-making.
MAN 2-K	<p>The Forest Service should comply with the Obama Administration's Executive Orders requiring federal agencies to <u>speed up the special use permitting process</u> (particularly with regard to access to energy, renewable energy, and mining).. The Forest Service should significantly reduce the turn-around time for issuing Special Use Permits on the TNF. Such reduced permitting time would enhance the public benefits of the Mining and Renewable Energy Resource LUD proposed in comments submitted regarding the Forest Plan revision.</p> <ul style="list-style-type: none"> <li>○ See Executive Order 13580, dated July 12, 2011, Executive Order 13604, dated March 22, 2012, and the May 17, 2013 Presidential Memorandum to the Executive Departments and Agencies entitled: Modernizing Federal Infrastructure Review and Permitting Regulations, Policies and Procedures all have the same purpose. That purpose is to achieve modernization of the Federal Government's review and permitting of infrastructure projects, which the Presidential Memorandum asserts will reduce aggregate timelines for major infrastructure by half.</li> </ul> <p>Similar themes are found in SOCs: ENER 3-X, MAN 2-K, MAN 8-B, MINE 3, MISC-EDIT 7, RR-16</p>
MAN 2-L	<u>Overly restrictive land use designations prevent science-based analyses of potential impacts of proposed projects</u> (e.g., during permit decisions).
MAN 2-M	<p>Requests that other <u>parties be closely involved with the Forest Service in the Forest Plan revision process</u>, including:</p> <ul style="list-style-type: none"> <li>• The State of Alaska requests to be involved, under existing MOUs, in the review of significant issues identified during the public comment period, and development of the information needs assessment and final report for the Forest Plan five-year review.</li> <li>• Request that no large scale or substantive changes be made to the wildlife conservation strategy without scientific review from multiple scientists and partner agencies.</li> </ul>
MAN 2-N	In new version of the Forest Plan, <u>recommend that the USFS list Standards &amp; Guidelines separately, organized by LUD (Chapter 3) and by resource (Chapter 4)</u> . This will resolve uncertainty about what is a standard and what is a guideline. See 2002 Chugach Forest Plan for example.

MAN 2-O	<p>Comments expressing concerns about <u>how public and agency comments are considered and weighed in Forest Service planning and permitting decisions</u>:</p> <ul style="list-style-type: none"> <li>• Do not have confidence that public comments received on the Forest Plan will have any effect on the outcome.</li> <li>• Feel that comments made in planning sessions with local communities have been ignored by the Forest Service.</li> <li>• The agency planning process has dragged on for so long that it is a significant burden for rural communities to advocate successfully for their needs.</li> <li>• Believe the region should be allowed to "manage ourselves".</li> <li>• The public process means little; outcomes are determined by political direction from above and budgets.</li> <li>• The Forest Service will be swayed by pressure from outside special interest groups, rather than doing what is best for the region and for Alaska.</li> <li>• Although the State of Alaska alludes otherwise, the Forest Service allows the State of Alaska to be intimately involved in decision-making processes and gives the State's view immense latitude.</li> <li>• The national forest belong to all US citizens. It is not accurate to claim that the public "outside" has less right to comment on Tongass management.</li> <li>• It is important to fairly involve stakeholders, seek constantly to apply the best available science, avoid irreversible damage, and retain government accountability.</li> <li>• Question regarding how an organization would be invited to prepare and recommend a wildlife conservation strategy for the Tongass. Could the Wildlife Society or another non-government organization submit an analysis and proposal?</li> </ul>
MAN 2-P	<p><u>Concern that there are too many overlapping EIS and processes requiring public involvement occurring at the same time</u> (e.g., electrical intertie, road systems), as well as the potential Forest Plan revision. This creates confusion for the public and difficulty assessing effects. The processes seem disconnected. Recommend that a Forest Plan review be done first, to set the guidelines before other decisions are made.</p>
MAN 2-Q	<p>There should be <u>a simplified procedure put in place to amend or change a LUD</u>, as needed, to adapt to changing conditions in the future.</p>

MAN 2-R	Recommend that a plan amendment <u>remove inventoried roadless areas from the timber base</u> , a change that better matches on-the-ground realities.
MAN 2-S	<p><u>Clearly assemble timber related data in a manner that can be understood.</u></p> <ul style="list-style-type: none"> <li>Sealaska strongly recommends that second growth statistics have a separate, stand-alone section in the draft EIS. The 2008 document and subsequent decisions promote the slow transition from old growth to second growth management for a considerable portion of the TNF. Therefore the second growth resource needs to be displayed so that commenters will understand the amount of second growth that is located within the tentatively suitable component, inventoried roadless areas, shore buffers of 500 and 1,000 feet, fish and game management buffers, and other identified categories that can restrict the second growth forest from being managed with timber harvest being conducted. In addition, the second growth data should include age classes, net acres, and volume classes into the future. This data should be refined to location by ranger district or finer within the categories mentioned above and in lands identified for future timber harvest. Productive old growth (POG) acres and volumes need to be displayed so that commenters will easily see where it exists in inventoried roadless, old growth reserves, stream and shoreline buffers and corridors, NIC 1 and NIC 2 components, legislated LUD 1 and LUD 2 areas, and the net acres and volumes available for timber harvest. At a minimum, this data should be subdivided by ranger districts within the TNF. Then the old growth and second growth data, as assembled in the manner recommended above, needs to be presented in like detail for each of the alternatives discussed in the draft EIS that will be made available to the public for its comments. The draft should include an overview of the timber volume that is available to support various levels of small industry, medium integrated industry, and large integrated industry for the TNF. In the cases of the integrated scenarios, analysis of the cost of water transportation to logical manufacturing centers should be included. Each alternative should include a detailed discussion of the manufacturing sizes that it could support.</li> </ul>
MAN 2-T	<p>As the Forest Plan is revised, request that the Forest Service <u>be more forthright regarding the effect litigation and legal constraint have had on the management of the TNF</u>. The effect of these constraints should be explained so that commenters and members of the public can have a better understanding of how and why the TNF has been managed recently.</p> <p>Similar themes are found in SOCs: MAN 2-T, TIM 1-H, TIM 4-G</p>
MAN 2-U	<p>As the Forest Plan is revised, request that it contain a report including, but not limited to, a <u>description of current hatchery and aquaculture projects, an analysis of the success of these projects, and a prioritized list of projects</u></p>

	<p><u>anticipated for the duration of the management plan.</u> The report shall be submitted by the Secretary to the Congress with recommendations for any legislative action, which the Secretary may deem necessary to implement the proposed hatchery and aquaculture projects. This report is required under ANILCA 507(b).</p> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>
MAN 2-V	<p>As the Forest Plan is revised, the EIS should <u>include at least one alternative that does not aim to produce marketable products from second growth</u>, as an integral part of the transition away from old growth logging.</p>
MAN 2-W	<p>As the Forest Plan is revised, it should <u>not be just a "snap shot" with decisions made only on the basis of current conditions.</u> It needs to evaluate future opportunities in young growth development, access, infrastructure, water, electrical, and other issues.</p>

## 4.39 TNF MANAGEMENT – LAND OWNERSHIP (MAN 3)

Comments related to new or pending land ownership changes, including Sealaska land bill, state forest, AMHT, landless claims by Alaskan Natives.

### 4.39.1 Comment Analysis

A total of 36 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Audubon Society, Alaska Native Brotherhood Camp 70, Central Council Tlingit and Haida Indian Tribes of Alaska, Friends of Admiralty Island, Kootznoowoo, Inc., Sealaska Corporation, Southeast Alaska Fishermen's Alliance, The Nature Conservancy, and Trout Unlimited.

Comments were also submitted by US Senator Lisa Murkowski, the State of Alaska, the US Fish and Wildlife Service, University of Alaska – Fairbanks, Haines Borough, Ketchikan Gateway Borough, and City of Ketchikan. Comments were made at public meetings in Craig, Petersburg, Sitka, and Wrangell, and also came from unaffiliated individuals. Two comments were from form letters.

Eight of the 36 comments are about land transfers reflecting a significant change that needs to be reflected in the Forest Plan (MAN-3A); five comments state a lack of support for any land transfers from Tongass forest, including to the state or Sealaska Corporation (MAN 3-H). The remaining SOCSs have one or two comments each, except for MAN 3-C with three.

### 4.39.2 Statements of Concern

MAN 3-A	<u>Land transfers represent significant changes and need to be reflected in the Plan;</u> this includes the potential changes from the Sealaska land entitlement bill, the proposed Mental Health Lands Trust land exchange, and the transfer of land to the State of Alaska.
MAN 3-B	<u>Land Transfers do not require a Forest Plan revision;</u> such as the Sealaska Lands Bill and the Mental Health Trust Authority land swap.
MAN 3-C	<u>Support the land exchange between the Alaska Mental Health Trust and the Forest as it provides much needed timber</u> for the southern southeast region economy.
MAN 3-D	The Forest Service should <u>implement the Sealaska lands bill</u> , update the Plan accordingly, and defend these changes.
MAN 3-E	Amend the Forest Plan to <u>consider the nature of the ANCSA, ANILCA and the comments and appeals of KINC [KOOTZNOOWOO, INC.]</u>
MAN 3-F	The Forest Service should <u>acknowledge and identify Traditional Boundaries for each Tribal community to assist in stewardship obligations.</u>

MAN 3-G	<p><u>The US Government should convey federal lands within the Ketchikan Gateway Borough to the Borough.</u> Only three-tenths of one percent of the land in the Ketchikan Gateway Borough is taxable and readily available for development. Despite the extensive federally owned lands, the Borough does not receive federal impact aid for its schools, and is facing the prospect that Secure Rural Schools funding and Payments in Lieu of Taxes funding will be reduced or eliminated.</p>
MAN 3-H	<p><u>Do not support Tongass land transfer to Sealaska or landless claims.</u></p> <ul style="list-style-type: none"> <li>• So much Native Corporation land has been logged. Passage of a Sealaska lands bill will put added stress on sensitive old growth species. The Tongass should consider measures that would strengthen the existing conservation strategy, rather than lose old-growth habitat through the Sealaska lands bill. The National Forests belong to every American including present and future generations of American Indians.</li> <li>• The proposed Sealaska legislation currently pending in Congress and the <u>proposed Big Thorne sale would both exacerbate the [old growth] high grading and the impacts to wildlife on the [POW] island.</u></li> </ul>
MAN 3-I	<p><u>Implement the entire Forest Plan.</u> Parts of the Plan, such as the Conservation Strategy, have been strictly adhered to while the timber development portions have not been executed.</p>
MAN 3-J	<p>The Legislative intent of ANILCA and the Tongass Timber Reform Act was to <u>allow hatcheries</u>, and not just fish passageways, ladders and rehabilitative stream work.</p> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>
MAN 3-K	<p>The USFS should implement a planning process to <u>identifying lands located in and around the five landless communities of Haines, Tenakee, Petersburg, Wrangell, and Ketchikan to be turned over to new Native Corporations</u> or other entities in order to resolve outstanding Native land claim issues and correct the landless injustice.</p>
MAN 3-L	<p><u>The Roadless Rule is a violation of ANILCA.</u> Congress found that ANILCA represents the proper balance between lands set aside in national conservation system units with public lands available for more intensive use and disposition (16 U.S.C. § 3101(d)). Congress also prohibited administrative agencies from withdrawing more than 5,000 acres of additional Alaska land without Congressional approval (16 U.S.C. § 3213(a)). In the event the TNF remains subjected to the Roadless Rule, the USFS must evaluate its impacts on the Forest Plan and the USFS's ability to comply with federal law.</p>

MAN 3-M	The Forest Service should <u>direct Sealaska and AMHT land exchanges away from Reserves and beach buffers, which are important to a broad variety of wildlife.</u> For transfers that do affect Reserves, the USFWS can assist the Forest Service in identifying suitable replacement acres.
MAN 3-N	<u>Safeguard Petersburg Creek</u> from development.
MAN 3-O	<u>The amount of areas classified for Timber Management is disturbing.</u>
MAN 3-P	Consider the <u>purchase of the Shee Atika/Cube Cove lands, including the Lake Florence drainage.</u>
MAN 3-Q	<u>Local governments need to be aware of USFS plans</u> within borough boundaries.
MAN 3-R	Amend the land management plan, and <u>implement a swift transition from old-growth logging to a more sustainable Tongass.</u>
MAN 3-S	<u>Rename and co-name all geographical locations</u> within the Tongass National Forest with their original Tlingit, Haida, and Tsimshian names in the Forest Plan, maps, and all USFS Tongass publications.  Similar themes are found in SOCs: CULT 3, CULT 8, MAN 3-S, MAN 6-F

## 4.40 TNF MANAGEMENT – INTEGRATED RESOURCES MANAGEMENT PLAN (MAN 4)

Comments related to the Integrated Resource Management Plan or on adaptive management.

### 4.40.1 Comment Analysis

A total of 12 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Forest Association, Prince of Wales Community Advisory Council, Sitka Conservation Society, Southeast Alaska Fishermen's Alliance, and Southeast Conference.

Comments were also submitted by Alaska State Representative Peggy Wilson, by the City of Craig, at the public meetings in Craig and Wrangell, and from unaffiliated individuals. No comments came from form letters.

One-third of the comments were about the need to develop a sustainable Triple-Bottom-Line approach to Tongass management. The other SOCs had one or two comments each.

### 4.40.2 Statements of Concern

MAN 4-A	The majority of timber and other resource management needs can be accomplished by <u>adaptive management prescriptions and plans</u> .
MAN 4-B	<u>The Forest Service should engage in rulemaking to reduce the number of IRAs in the Forest sufficiently to allow activities supported by communities in the region.</u> By restricting road access and effectively prohibiting timber harvest within inventoried roadless areas (IRAs), the Roadless Rule has made the Plan's Timber Sale Program Adaptive Management Strategy impractical to implement.
MAN 4-C	<p><u>The Tongass should develop a sustainable Triple-Bottom-Line (TBL) resources management solution.</u></p> <ul style="list-style-type: none"> <li>• A TBL solution, by definition, must meet or exceed all environmental and social/cultural requirements of the land base while at the same time providing a sustainable level of economic activity which covers all costs related to managing the land base. In this type of integrated resource management strategy, the land base is spatially managed for all resource objectives simultaneously, taking advantage of forest dynamics and the capabilities of individual forest stands across the land base to meet varied resource objectives over time.</li> <li>• This approach enables the entire land base to contribute to all objectives, in contrast with dividing the land base up into zones or reserves that are only allowed to contribute to designated objectives. This forest management approach enables the development of conservation strategies that would improve the level of wildlife habitat protection over</li> </ul>

	<p>time while also supporting a viable forest industry with profitable harvest and manufacturing levels of 300 - 400 million board feet per year.</p> <ul style="list-style-type: none"> <li>• This type of conservation strategy would enable the Tongass to significantly improve its contributions to the regional economy. These benefits would be spread across the region, particularly benefitting the smaller, rural communities where forest management and manufacturing activities would take place.</li> </ul> <p>Similar themes are found in SOCs: MAN 4-C, SOC2-D, TIM 1-E</p>
MAN 4-D	<p><u>The current adaptive management strategy for timber harvest is a good one; however, the current ASQ is unreasonable.</u></p>
MAN 4-E	<p><u>The current adaptive management is not achieving conservation, wildlife, and resource management goals.</u> There is a need for <u>more flexibility</u> in integrating wildlife, recreation, resources and renewable energy, instead of simply setting-aside areas. The Chief of the Forest Service should re-delegate the authority to make permitting decisions to the Forest Supervisor and District Rangers.</p> <p>Similar themes are found in SOCs: ENER 3-X, MAN 2-B MAN 2-H, MAN 4-E, RR-15</p>
MAN 4-F	<p>Based on monitoring, and <u>through adaptive management</u>, the Forest Plan can be modified using the NEPA process, culminating in an EA or EIS.</p>
MAN 4-G	<p>The transition to a more adaptive management should allow and <u>support fisheries enhancement projects</u>, which would benefit commercial, subsistence, sport, and recreational fishermen.</p> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>

## 4.41 TNF MANAGEMENT – GOALS & OBJECTIVES OR STANDARDS & GUIDELINES (MAN 5)

Comments about the Tongass Forest Plan’s Goals and Objectives, and Standards & Guidelines that are not linked to the Wildlife Conservation Strategy. Note that comments about Standards & Guidelines that are part of the Wildlife Conservation Strategy are found in WCS 1).

### 4.41.1 Comment Analysis

A total of 19 comments on this topic were submitted. This included comments from representatives of the following entities: Alaska Forest Association, Pacific Fishing Inc., Southeast Alaska Fishermen's Alliance, The Nature Conservancy, Un-Cruise Adventures, the , the State of Alaska, US Forest Service, and the Craig public meeting. No comments on this topic came from unaffiliated individuals or from form letters.

Half the comments received were about one of two SOCs: MAN 5-A or MAN 5-C, about the forest-wide Goal & Objectives and Standards & Guidelines for (respectively) Fish, Fish Habitat, Enhancement, and, Recreation and Tourism.

### 4.41.2 Statements of Concern

MAN 5-A	<p>Fish, Fish Habitat, Enhancement</p> <p>Comment regarding the Desired Future Conditions (2008 plan, p. 2-1):</p> <ul style="list-style-type: none"> <li>• <u>Recognize salmon as a major economic driver of the region</u> and recognize salmon habitat management as a major emphasis of overall forest management.</li> </ul> <p>Comments regarding Standards &amp; Guidelines for Fish (2008 plan, Chap. 4 and Appendices C and D):</p> <ul style="list-style-type: none"> <li>• Recommend <u>no change</u> as they have been found to meet or exceed the recommendations of the Anadromous Fish Habitat Assessment and have been shown to be effective through annual monitoring.</li> <li>• The Standards &amp; Guidelines <u>fail to allow for fish enhancement projects that have public support, would benefit multiple users and would support the Southeast Alaska economy</u>. The plan generally references fish habitat improvements as being "temporary in nature", but ANILCA envisions there may be situations where permitting of permanent improvements should be allowed.</li> </ul> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>
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MAN 5-B	<p>Minerals and Geology</p> <p>Comment regarding Forest-Wide Goals and Objectives (2008 plan, p. 2-5) for Minerals and Geology:</p> <ul style="list-style-type: none"> <li>• Revise to <u>recognize the important contributions that roads and utilities make toward achieving the other goals and objectives for the mining sector</u>. Less than 10% of the Tongass is accessible by existing roads.</li> </ul> <p>Comment regarding Standards &amp; Guidelines for Minerals and Geology:</p> <ul style="list-style-type: none"> <li>• Recommend the following change relative to Locatable Mineral Operations, A. 4 (2008 plan, p. 4-39): "Following locatable mineral exploration and/or development, <u>reclamation will be designed consistent with the underlying non-mineral Land Use Designation (LUD)</u>."</li> </ul>
MAN 5-C	<p>Recreation and Tourism</p> <p>Comments regarding Forest Wide Goals and Objectives (2008 plan, Chap. 2) for Recreation and Tourism:</p> <ul style="list-style-type: none"> <li>• Revise the goals and objectives to recognize the <u>important contributions that roads and utilities make toward achieving the other goals and objectives for the recreation and tourism sector</u> (p. 2-6). Less than 10% of the Tongass is accessible by existing roads.</li> <li>• Establish a <u>2-3 year permit planning cycle</u> allowing for operators to best meet and plan for out year operations.</li> <li>• Evaluate and seek to <u>meet the increased demand for commercial recreation services across the Forest</u>. Develop an integrated implementation strategy which could include the following: increase capacity at hardened recreation sites that are near or over current demand for service days, identify sites/projects where increased demand or existing/sustained use may warrant the development of new trails, disperse use in remote areas to minimize impacts on environment.</li> <li>• <u>Undertake site-specific evaluation</u> of use areas relative to current levels of use, desired levels of use, potential for increased demand, and current condition of recreation facilities/trails. <ul style="list-style-type: none"> <li>• Develop in coordination with other partners (industry, communities, NGOs, Tribes, etc.) <u>a forest-wide set of priority recreation projects</u> (i.e. facility/trail development or maintenance).</li> </ul> </li> </ul> <p>Comments regarding Standards &amp; Guidelines for Recreation and Tourism:</p> <ul style="list-style-type: none"> <li>• Concern <u>that implementation of the Forest Plan relative to recreation and tourism is less than optimal</u>, due in part to budget constraints and the</li> </ul>

	<p>agency's primary focus on other programs of work such as the timber program.</p> <ul style="list-style-type: none"> <li>• <u>Implementation of the Recreation and Tourism Standards &amp; Guidelines</u>, and in particular the Recreation Resource Planning: REC 2 (2008 plan, p. 4-44-45), <u>is not meeting the needs of the visitor industry</u>. Encourage the Forest Service to continue to support groups such as the Visitor Industry Cluster Working Group to seek partners, identify gaps, and advance mutual goals and objectives.</li> <li>• Request Recreation Opportunity Spectrum (ROS) be changed to <u>increase the number of groups and group size per day allowed in areas classified as Primitive</u> (2008 plan, Appendix I). Alternatively, reclassify Non-Wilderness Primitive areas to Semi-Primitive non-motorized.</li> </ul> <p>Similar themes are found in SOCs: ENER 3-M, MAN 5-C, REC-1, REC-6, TOUR 1-D, TOUR 1-H, TOUR 3-B, TRANS 4-C</p>
MAN 5-D	<p>Riparian</p> <p>Comment regarding Standards &amp; Guidelines:</p> <ul style="list-style-type: none"> <li>• Recommend <u>no change</u>, as they have been found to meet or exceed the recommendations of the Anadromous Fish Habitat Assessment and have been shown to be effective through annual monitoring.</li> </ul>
MAN 5-E	<p>Soil and Water</p> <p>Comment regarding Standards &amp; Guidelines:</p> <ul style="list-style-type: none"> <li>• Recommend <u>no change</u>, as they have been found to meet or exceed the recommendations of the Anadromous Fish Habitat Assessment and have been shown to be effective through annual monitoring.</li> </ul>
MAN 5-F	<p>Timber</p> <p>Comments regarding Desired Conditions (2008 plan, p. 2-1, p. 3-116) related to timber management:</p> <ul style="list-style-type: none"> <li>• The forest is actively transitioning away from an old growth timber focus towards a young growth and restoration focus. <u>Integrated management projects with restoration, engineering, timber, and recreation components are replacing stand-alone large scale old growth timber projects.</u></li> <li>• The <u>old growth "bridge timber" that is required for the transition is sourced from areas compatible with The Tongass Futures Roundtable Collaboration</u> (Devil's club map). No large old growth projects are planned in Conservation Priority watersheds.</li> <li>• Resource restoration projects are emphasized on par with timber and</li> </ul>

	<p>road projects. <u>Restoration projects are recognized for their economic benefits as well as their ecologic benefits.</u></p> <ul style="list-style-type: none"> <li>• The <u>transition to primarily young growth management will be completed before the next Tongass Forest Plan is developed.</u></li> </ul> <p>Comments regarding Standards &amp; Guidelines for Timber:</p> <ul style="list-style-type: none"> <li>• Timber Standards &amp; Guidelines must be revised to <u>make timber sales economic through all market cycles</u> to meet its objectives for a sustainable timber program.</li> <li>• The <u>Standards &amp; Guidelines in the Forest Plan are well matched</u> to the conditions of the environment and how they react to timber management.</li> </ul>
MAN 5-G	<p>Transportation</p> <p>Comment regarding Forest-Wide Goals and Objectives for Transportation:</p> <ul style="list-style-type: none"> <li>• Revise to <u>recognize the important contributions that roads and utilities make toward achieving the other goals and objectives for the transportation sector.</u> Less than 10% of the Tongass is accessible by existing roads.</li> </ul>
MAN 5-H	<p>Wilderness</p> <p>Comment regarding Forest-Wide Goals and Objectives for Wilderness:</p> <ul style="list-style-type: none"> <li>• Include an additional goal that reflects the legislative intent of ANILCA relative to fish enhancement, allowing the Secretary of Agriculture to <u>permit fishery research, management, enhancement, and rehabilitation activities within national forest wilderness and wilderness study areas.</u></li> </ul> <p>Comment regarding Management Prescriptions for Wilderness:</p> <ul style="list-style-type: none"> <li>• Noted that the <u>Fish Habitat Planning Management Prescriptions (2008 plan, p. 3-11) appear to be more in line with the legislative intent of ANILCA regarding enhancement, than are the Wilderness Goals and Objectives (2008 plan, p. 3-7).</u></li> </ul> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>

MAN 5-I	<p>General comments regarding Standards &amp; Guidelines</p> <ul style="list-style-type: none"> <li>• <u>Adjust Standards &amp; Guidelines where new scientific information will assist</u> in the forest management goal of balancing resource use with resource protection.</li> <li>• Recommendation that the Forest Plan <u>improve its management actions to relax some of the ... Standards &amp; Guidelines to a mixed use management action</u>, rather than the ever increasing percentage of management measures that are placing large blocks of the Tongass off limits to resource development.</li> </ul>
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## 4.42 TNF MANAGEMENT – TRIBAL GOVERNMENT (MAN 6)

Comments regarding the Forest Service and Tribe’s government-to-government relationship and tribal consultation.

### 4.42.1 Comment Analysis

A total of 13 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Central Council Tlingit and Haida Indian Tribes of Alaska, Douglas Indian Association, the Organized Village of Kake, commenters at the Craig, Petersburg and Wrangell public meetings, and from unaffiliated individuals. No comments on this topic came from form letters.

Three each were about MAN 6-A and MAN 6-B, commenting (respectively) with several ideas for better Forest Service-Tribe communication to develop a plan with the Southeast Tribes to enable maximum utilization of the cedar (with several ideas), and, asking for improved Government-to-Government consultation regarding Forest Service roads and trails. Other SOCs each had one comment.

### 4.42.2 Statements of Concern

MAN 6-A	<p>The Forest Service should <u>develop a plan with the Southeast Tribes to enable maximum utilization of the cedar while the product is in a useable state</u>. In cases where cedar is to be commercially logged, please inform the local federally recognized tribes so that local weavers may gather bark prior to the commercial logging. Harvest time for Cedar Bark is May-July.</p> <p>Similar themes are found in SOCs: CULT 6, MAN 6-A, SUB 3-A, TIM 9-A</p>
MAN 6-B	<p><u>Government-to-government consultation regarding Forest Service roads and trails should be improved</u>. Agreements regarding forest roads must include the Tribe with whom the territorial boundary encompasses. Executive Order 13175 requires that Federal agencies must consult with federally-recognized Tribes on any actions that may affect tribal interests. This applies to any agreements regarding Forest Service roads located within the traditional boundaries of a Tribe that are important to for historic, subsistence, cultural, or economic reasons.</p>
MAN 6-C	<p><u>Ensure proper management of Sacred Sites</u>. The USFS must be in continuous communication with the Tribes regarding protection of culturally sensitive locations located within traditional boundaries. Due to the sensitivity of this information, no maps of sacred sites within the TNF should be created.</p>
MAN 6-D	<p><u>Create more partnerships with Tribes within TNF to implement monitoring studies</u> (data collection, monitoring, reporting, etc.). This is opportune time to create partnerships with Tribes' to conduct monitoring studies of areas that were logged before NEPA and compare to areas that were logged after NEPA.</p>

MAN 6-E	<p>Create <u>partnerships with municipalities and Tribes regarding biomass systems</u> within TNF.</p> <p>Similar themes are found in SOCs: All ENER 2 SOCs, LUD NEW/ENER-8, MAN 6-E, MAN 7-C, MAN 8-A, SOCIO 2-O, TIM 1-D, TUS LUD-3</p>
MAN 6-F	<p><u>The Forest Service should formally recognize the traditional territorial boundaries of the federally recognized IRA and Reservation tribes of Southeast Alaska.</u> This will establish a footprint for the respective governments to discuss areas of concern and potential partnership.</p> <p>Similar themes are found in SOCs: CULT 3, CULT 8, MAN 3-S, MAN 6-F</p>
MAN 6-G	<p>Public Law 106-511 enacted on November 13, 2000 establishing <u>the Southeast Alaska Intertie System</u> is not referenced, explained or identified in the 2008 Forest Plan.</p>
MAN 6-H	<p>Public meetings regarding the Tongass should always <u>include Wrangell.</u></p>
MAN 6-I	<p><u>More cooperation is needed among the State government, the Federal government, and the public.</u></p>
MAN 6-J	<p>The Forest Service must <u>discuss the 5-year review with Tribes.</u></p>

## 4.43 TNF MANAGEMENT – TOPIC MISSING (MAN 7)

The entire topic is missing from the Forest Plan and must be added; many parts of the Forest Plan need changed to address this topic.

### 4.43.1 Comment Analysis

A total of 53 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power Company, Alaska Miners Association, Alaska Native Brotherhood Camp 70, Alaska Power & Telephone Company (several offices), Cascadia Wildlands, Central Council Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, Ketchikan Chamber of Commerce, Kootznoowoo, Inc., Sealaska Corporation, Sitka Conservation Society, and United Southeast Alaska Gillnetters.

Comments were also submitted by US Senator Lisa Murkowski, Alaska State Representative Cathy Munoz, Alaska State Representative Peggy Wilson, the State of Alaska, and US Forest Service. Comments from the City of Craig, City and Borough of Juneau, Ketchikan Gateway Borough, and City of Ketchikan, as well as from public meetings in Craig, Haines, Ketchikan, Petersburg and Wrangell were received as well as from unaffiliated individuals.

No comments on this topic came from form letters.

Just about half the comments on this topic fall under MAN 7-A, stating that a Renewable Energy Plan is needed as part of the Forest Plan and listing a number of reasons why this is so. MAN 7-F had four comments, asking that missing information that is important to commercial fishing be included in the Plan. Other SOCS had one to three comments each (most had one).

### 4.43.2 Statements of Concern

MAN 7-A	<p><u>A Renewable Energy Plan is needed as part of the Forest Plan.</u> This is needed to:</p> <ul style="list-style-type: none"><li>• Be consistent with and address federal policies, EOs, and laws on greenhouse gas emissions, the 2009 Presidential Directive to shift federal facilities to 20% reliance on renewable energy by 2020, PI 106-511 (Nov 13, 2000) establishing electrical interties, national energy policy and national energy security policy, EO 13423 (Jan. 24, 2007, also called EISA) that requires Federal agencies to reduce energy intensity by 3% yearly or by a total of 30% by 2025.</li><li>• Address how these resources could be used in the national or local interest.</li><li>• Help assure the development of public and private renewable energy</li></ul>
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	<p>projects that would benefit all 32 towns and villages in Southeast Alaska.</p> <ul style="list-style-type: none"> <li>• Address the fact that the current requirements for siting hydroelectric projects in remote recreational land-use designated areas is unworkable and needs amending.</li> <li>• Recognize pre-existing power site classifications and other potential renewable energy resources on the TNF such as hydropower, geothermal, wind or other renewable energy sites.</li> <li>• Remedy situation now where Forest Service staff individually interpret how to address renewable energy development, lacking consistency throughout the TNF. There isn't a consistent position within the Forest Service in support or not of renewable energy development. For those wanting to develop a renewable resource, this confusion in policy inhibits development, whether by design or neglect.</li> <li>• Add LUDS to help water power projects proceed, whether conventional hydro projects or new types of marine hydrokinetic projects, much less geothermal, wind or other types of renewable energy technologies.</li> <li>• Address greenhouse gas emissions (GHG) or climate change issues that can be alleviated by responsible renewable energy development in the TNF.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-K, ENER 3-A, all LUD-NEW/ENER SOCs, MAN 7-A, MAN 8-A</p>
MAN 7-B	<p>Forest Plan is <u>missing information on conserving Forest resources as carbon banks and carbon sequestration</u> to mitigate the impacts of carbon emissions into the atmosphere that cause climate change. There is no information on carbon sequestration and other uses that relate to climate change mitigation.</p> <p>Similar themes are found in SOCs: ECO 1-A, ENER 3-E, ENER 3-W, MAN 7-B, MAN 8-E, RR-21, SCIENCE-B, TIM 9-I</p>
MAN 7-C	<p><u>The Forest Plan is silent on the use of the forest resource for regional biomass energy</u>, a critical economic opportunity for the region. The Council hereby encourages that the Forest Plan be amended to include the use of the forest resource for local biomass as an energy source and a commercial industry for the region.</p> <p>Similar themes are found in SOCs: All ENER 2 SOCs, LUD NEW/ENER-8, MAN 6-E, MAN 7-C, MAN 8-A, SOCIO 2-O, TIM 1-D, TUS LUD-3</p>
MAN 7-D	<p>The Forest Plan should <u>include the Bradfield Canal connection to western North America electrical grid</u> to allow import and export of electrical energy and voltage and system stability benefits.</p>

MAN 7-E	<p>Comments regarding Forest Plan gaps in <u>water flow and water yield process or information</u>:</p> <ul style="list-style-type: none"> <li>• <u>The Forest Service needs to quantify the water flow it believes is needed to maintain favorable conditions and include this in the Forest Plan.</u> Due to diminishing water supplies elsewhere, water will likely be the next big resource that is exported from the Tongass. Ecosystems require a certain level of stream flow to function properly, and taking too much water will have negative ecological effects.</li> <li>• <u>Water yield is not adequately addressed in the Forest Plan; it is being overlooked in heavily managed watersheds.</u> Neither the Forest Plan or timber sale analyses sufficiently address water yield. Water yield refers to how water moves across the landscape (how fast it moves, when it moves). The Tongass environment is heavily impacted by precipitation and there is evidence that as you remove vegetation from the landscape, water transfer occurs much more quickly, and in drier years this is exacerbated.</li> </ul> <p>Similar themes are found in SOCs: AQUA 2-H, MAN 1-G, MAN 7-E</p>
MAN 7-F	<p>Comments regarding <u>missing information important to commercial fishing</u>:</p> <ul style="list-style-type: none"> <li>• Add back into the Plan identified fish stocks that cross the forest (which were in a previous Forest Plan version), including the Marx Creek near Hyder, for chum salmon; and the Carroll Creek for its unique run of eulachon - one of the only identified island runs of eulachon in the world. Also see SOC FISH 3-F.</li> <li>• <u>Add a section to the Forest Plan listing water bodies with habitat damage adversely affecting commercial salmon runs, the estimated impact in terms of number/pounds of fish lost to the commercial sector annually, the estimated cost to restore the affected habitat, and a benefit/cost ranking.</u> This would provide a sense of where investments should be made to benefit the commercial sector and salmon consumers. As the plan is currently structured, it is difficult for commercial fishermen to see what the effects of past practices are, how much it would cost to remediate them, and what the benefits would be.</li> <li>• The Forest Plan has little information about the watersheds that are the most important contributors to salmon production.</li> </ul>
MAN 7-G	<p><u>Comments that the Forest Plan is not accurately accounting for today's timber export and related markets. Views expressed are differing:</u></p> <ul style="list-style-type: none"> <li>• Concern that the Forest Plan does not take a realistic account of the role of timber export markets. <u>Exports are viewed as an exceptional thing that are</u></li> </ul>

	<p><u>approved annually; but in practice it has become established policy that 50% of the timber, and all of the cedar, is exported.</u> That changes the cost/benefit analysis, especially since preserving mill jobs seems to be an overriding objective of the current timber strategy.</p> <ul style="list-style-type: none"> <li>• Concern that increasing export of Tongass timber is occurring and this undermines the effort to assist local communities through boosting timber harvest. <u>With more exports, the local return on investment declines. And, the same amount of habitat loss is creating fewer and fewer American and Southeast Alaskan jobs.</u></li> <li>• For the TNF to contribute to local economies, <u>add a discussion that would provide for the export of unmanufactured timber products such as round logs.</u> This would allow better information on attaining various harvest alternatives when manufacture into finished and semi-finished products cannot be made due to costs that are too high and uncompetitive to meet market demands.</li> </ul>
MAN 7-H	<u>Forest Plan needs to change to address changing socioeconomic conditions- refer to SOCIO 1 SOCs for details.</u>
MAN 7-I	<u>All references to the Alaska Coastal Management Program should be removed from the Forest Plan, as this program no longer exists.</u> Specific references are made in the Beach and Estuary (Forest Plan, page 4-4), Riparian (Forest Plan, page 4-4), Lands (Forest Plan, pages 4-27, 4-28, and 4-36), Transportation (Forest Plan, page 4-80), and Wildlife (Forest Plan, page 4-93) Forest-Wide Standards and Guidelines. Additionally, the term "practicable" is defined in the Forest Plan (Chapter 7, page 7-29) by reference to the Alaska Coastal Management Program. This term is used throughout the Forest Plan, and therefore must be redefined. The State of Alaska suggests the following definition: Feasible in light of consideration for overall project purpose and need, and compliance with applicable standards and guidelines.
MAN 7-J	A priority for Tongass management should be <u>research and education.</u> Provide more internship and educational opportunities. Creation of "Citizen Science" at a young age can prove beneficial for the future management of the TNF.
MAN 7-K	<u>Comments on changed or new practices or policies by the State of Alaska that the TNF and Forest Plan must consider and address:</u> <ul style="list-style-type: none"> <li>• The Forest Service needs to stop relying on the State to assure viable wolf, bear, and marten populations. The State has a different understanding of its legal duty to protect predator populations than does the Forest Service. Until the Supreme Court rejected their argument in <i>West v. State</i>, 248 P.3d 689 (Alaska 2010), the State argued it was under no obligation to sustain any predators at all, seeing them as a pest and not among the State's</li> </ul>

	<p>constitutionally protected renewable resources. The State’s bottom line for wolves and other predators is now the sustained yield principle, still a far cry from NFMA’s viability standard under the 1982 rules, or even the biodiversity standards in the revised regulations. What the State considers a sustainable wolf population is not a viable population under NFMA.</p> <ul style="list-style-type: none"> <li>○ State/Federal communication between practicing (USFS/State) biologists and decision-makers (State Board of Fisheries/Board of Game and TNF) should be improved. The State BOG is relying on obsolete Forest Service deer data for decision-making.</li> <li>○ The emergence of the state’s aggressive predator control practices should spur clarification bolstering the 18 deer per sq. mi. standard. The fact that predator control is legally mandated where hunters have trouble getting sufficient deer undermines the basic assumptions of the wolf Standards and Guidelines it is being applied.</li> <li>○ <u>A concerning trend in the last few years has been the censoring of scientific information from state agencies— ADF&amp;G, ADEC, and others, that the Forest Service has traditionally relied upon to provide the best available science on wildlife.</u> The USFS didn’t create this situation, but the State’s change impacts operation of the Forest Plan conservation strategy because the Plan is designed to work when there is a free flow of information between state &amp; federal biologists. Given the politicization of the State’s science, it can no longer fairly be presumed to be the “best available.” For example, when State biologists expressed concern for wolves on Lindenberg Peninsula as a result of the Tonka timber sale, much of that information was never passed on to the Forest Service because it was edited out by DNR. Biologists said they were concerned for long-term wolf viability as a result of roads and clearcuts, and had specific reasons, but that information was edited out</li> </ul>
MAN 7-L	<u>The Forest Plan should be more forthright regarding the effect litigation and legal constraint have had on the management of the TNF so the public can better understand how and why the TNF has been managed recently.</u>
MAN 7-M	<p>Forest Plan fails to identify and map SAFETEA-LU (Public Law 109- 59, Sections 4407) corridors, Map 92337 dated June 15, 2005 and the Memorandum of Understanding between the USFS and State of Alaska.</p> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS-LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>
MAN 7-N	The current Forest Plan <u>does not address mineral development.</u>
MAN 7-O	<u>Is public safety covered in the Forest Plan?</u> The Forest’s engineering decisions and projects often affect public safety, so add this topic.
MAN 7-P	The Forest Plan should incorporate the <u>values of stewardship, collaboration, and promotion of vibrant communities.</u>

MAN 7-Q	<p><u>The Forest Plan needs to address mariculture.</u> Upland support is generally needed for mariculture, especially for small operators.</p> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>
MAN 7-R	<p><u>The forest has been a pioneer in the area of sustainable operations.</u></p> <ul style="list-style-type: none"> <li>• For example, in 2013, Tongass published the Second Environmental Footprint Report that detailed what they have done to reduce environmental impact from each footprint area, including but, not limited to; energy, water, fleet, waste reduction and, green purchasing. Demonstrating national leadership, the Tongass was one of only six pilot forests in the Forest Service to join the EPA Climate Leaders program.</li> </ul> <p><u>It is time to take the next step and incorporate sustainable science language and principles into the Forest Plan.</u></p> <ul style="list-style-type: none"> <li>• One goal would be to conceptualize sustainable operations into Forest planning. This is the direction the climate change reporting/scorecard are driven toward as well. <ul style="list-style-type: none"> <li>○ Is Forest foot printing discussed in Forest Plans? How do planners receive the information about sustainable operations? How do they envision using this information in their planning? How do the sustainable operation projects help the Forest planners? In what way?</li> </ul> </li> </ul>
MAN 7-S	<p>More detailed <u>standards and guidelines for young growth</u> are missing and needed in the Forest Plan.</p>

## 4.44 TNF MANAGEMENT – FOLLOW FEDERAL LAW (MAN 8)

Comments and concerns that the Forest Service is or has not followed federal policy, executive orders (EO) or management directives.

### 4.44.1 Comment Analysis

A total of 47 comments were submitted for this topic. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Audubon, Alaska Electric Light and Power Company, Alaska Forest Association, Alaska Power & Telephone Company, Central Council Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, Ketchikan Chamber of Commerce, Law Office of James F. Clark, Pacific Fishing, Inc. Renewable Energy Alaska Project (REAP), Resource Development Council, Responsible Cruising In Alaska, Sitka Conservation Society, Southeast Alaska Power Agency, Southeast Conference, The Working Forest Group, and United Fishermen of Alaska.

Comments were also submitted by US Senator Lisa Murkowski, Alaska State Senator Bert Stedman, Alaska State Representative Cathy Munoz, former Governor and former Senator Frank Murkowski, and the State of Alaska. Comments from the City of Craig, City and Borough of Juneau, and City of Ketchikan were received as well as from unaffiliated individuals.

No comments on this topic came from form letters.

Half the comments were about two SOCs, MAN 8-A and MAN 8-C. The first is about the need for the Forest Plan to include a renewable energy plan (similar to MAN 7-A, but here reasons cited are to comply with a list of federal directives) and provide clarity on its renewable energy development policies. MAN 8-C urges the Forest Service to better implement multiple use management, which is being implemented due to a combination of the Roadless Rule, the Transition Policy, and because a reliable annual supply of 200 MMBF of economic timber to achieve an integrated timber industry has not been provided.

MAN 8-B and 8-D each had seven comments; the remainder of the SOCs here had one or two comments each.

### 4.44.2 Statements of Concern

MAN 8-A	<p><u>The Tongass Forest Plan must include a renewable energy plan and provide clarity on its renewable energy development policy.</u> The USFS has not followed Presidential direction on national energy policy or national energy security or climate policy or it would be giving more consideration to appropriate hydro, wind, geothermal, biomass, wave and tidal energy resources in the TLMP. Specific laws, EOs and policy that are <u>not being complied</u> with are:</p> <ul style="list-style-type: none"><li>• Executive Order 13423/EISA (Energy Independence and Security Act)</li><li>• Executive Order 13514, which expanded on the energy reduction and</li></ul>
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	<p>environmental performance requirements of Executive Order 13423</p> <ul style="list-style-type: none"> <li>• In a June 25, 2013 President Obama speech on renewable energy and climate change remarked, “Today, I’m directing the Interior Department to green light enough private, renewable energy capacity on public lands to power more than 6 million homes by 2020.”</li> <li>• P.L. 106-511 on November 13, 2000, that authorized federal funding for the then proposed Southeast Alaska Electrical Intertie System</li> <li>• This will also remedy failures of the EO 12866 review that did not properly analyze the value of renewable energy development in Southeast Alaska communities.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-K, All ENER 2 SOCs, ENER 3-A, all LUD-NEW/ENER SOCs, MAN 6-E, MAN 7-A, MAN 7-C, MAN 8-A, SOCIO 2-O, TIM 1-D, TUS LUD-3</p>
MAN 8-B	<p>Implement the orders cited below, which collectively have as their purpose to <u>significantly reduce the aggregate time required to make Federal permitting and review decisions on infrastructure projects, including renewable energy projects in Alaska, while improving outcomes for communities and the environment.</u></p> <ul style="list-style-type: none"> <li>• President’s Executive Order 13604 as further defined by Presidential Memorandum dated May 17, 2013, permitting on the TNF should be accelerated. Implement Executive Orders 1) 13563, dated January 18, 2011, Improving Regulation and Regulatory Review; 2) 13580, dated March 22, 2012, Interagency Working Group on Coordination of Domestic Energy Development and Permitting in Alaska; 3) 13604, dated March 22, 2012, Improving Performance of Federal Permitting and Review of Infrastructure Project; and 4) Presidential Memorandum, dated May 17, 2013, Modernizing Federal Infrastructure Review and Permitting Regulations, Policies, and Procedures.</li> </ul> <p>Similar themes are found in SOCs: ENER 3-X, MAN 2-K, MAN 8-B, MINE 3, MISC-EDIT 7, RR-16</p>
MAN 8-C	<p><u>Multiple use management is the law on all national forests, yet this is not being followed on the Tongass nor is the 2008 Forest Plan being implemented due to a combination of the Roadless Rule, the Transition Policy, and because a reliable annual supply of 200 MMBF of economic timber to achieve an integrated timber industry has not been provided.</u></p> <ul style="list-style-type: none"> <li>• <u>Acknowledge that the Plan has been amended by the re-imposition of the 2001 Roadless Rule and by the Secretary’s policy decision to transition to second growth on roaded areas.</u> The aggregate effect has been to remove half of the suitable timber base (300,000 acres in IRAs) from the 2008</li> </ul>

	<p>Amended Forest Plan.</p> <ul style="list-style-type: none"> <li>• Either the re-imposition of the 2001 Roadless Rule or the imposition of the Transition Plan standing alone, should have caused the Forest Service to recognize that because conditions in a unit [i.e., the entire TNF] had significantly changed, <u>it had a duty to amend the Forest Plan pursuant to NEPA, as the National Forest Management Act (NFMA) commands [16 USC 1604(f)(5)].</u></li> <li>• <u>Management on the Tongass is too overly protective of roadless areas and old-growth conservation goals, to the detriment of other forest uses recognized by Congress</u> in statutes like the Organic Act, MUSYA and the NFMA) <ul style="list-style-type: none"> <li>○ For example, the 2008 Forest Plan EIS indicates that 91% of the old growth timber on the Tongass is in reserves, and only 9% is available for timber sales. Much of the 9% is subject to costly partial cutting guidelines that significantly raise the cost of harvesting timber while simultaneously diminishing the growth potential for those lands. The 9% is also disproportionately low-volume timber, and a disproportionate amount of the 9% is at higher than average elevation. Both of these characteristics increase the cost of harvesting the timber. The low-volume, high-elevation timber is also significantly lower quality and less valuable than the average timberland on the Tongass.</li> <li>○ For example, even though the recent Tonka timber sale is an economic timber sale, the 2008 Forest Plan identified over 16,000 acres of commercial old-growth available for harvest in the Tonka VCUs, whereas the Agency’s analysis indicated that only about six thousand acres of the old growth in the area would be economic. In fact, only 2,085 acres of economic timber is approved for harvest in the Tonka timber sale despite the severe timber shortage in the region.</li> </ul> </li> <li>• <u>The TNF is a working forest not a National Park.</u> The evolution of forest management has effectively redefined the very purpose for which the national forests were established, in direct contradiction to the congressional intent. Although the TNF was established as a working forest, today it is being managed more like a national park.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-I, ENER 3-B, MAN 8-C, MINE 4, TIM 1-C, TIM 1-G, TIM 4-B, TIM 5-A</p>
MAN 8-D	<p><u>Administratively reinstate the Tongass Exemption to the Roadless Rule through new rulemaking, or by amending the original Roadless Rule by exempting Alaska lands,</u> as required by ANILCA. Do this to fulfill a legal obligation the USFS made to the State of Alaska pursuant to a Court-approved 2003 settlement agreement, and to comply with the Congressional directives in ANILCA and the TTRA. The Roadless Rule is a withdrawal in violation of ANILCA, hence the Tongass exemption to the Rule must be reinstated.</p>

MAN 8-E	<p>Take into account Presidential direction on <u>conserving forest resources for use as carbon banks to mitigate carbon emissions in atmosphere and climate change.</u></p> <p>Similar themes are found in SOCs: ECO 1-A, ENER 3-E, ENER 3-W, MAN 7-B, MAN 8-E, RR-21, SCIENCE-B, TIM 9-I</p>
MAN 8-F	<p><u>Despite Congressional direction in the Tongass Timber Reform Act, the Tongass continues to high-grade large-tree old growth to this day.</u> The TNF appears to be writing its 5-year review without awareness of the Administration's goal of upholding the national public interest in protecting our remaining precious old-growth forest.</p>
MAN 8-G	<p><u>The Federal government policy changes have materially affected the Plan, and amended the Forest Plan without going through the National Environmental Policy Act (NEPA) process. Specifically, with regard to mining:</u></p> <ul style="list-style-type: none"> <li>• Special Use Permits for locatable minerals authorizing road access in or near Wilderness Areas are very difficult to obtain.</li> <li>• New leases for minerals subject to the Mineral Leasing Act of 1920, including geothermal resources are prevented by the 2001 Final Roadless Rule (RR).</li> <li>• There is no explanation in the RR or its ROD why the access impacts to IRAs associated with locatable minerals is different from the access impacts to IRAs associated with leasable minerals.</li> <li>• The RR will prevent road access in connection with mining exploration and development; while the RR allows "reasonable access" for cutting trees, this activity associated with mining exploration and development does not appear to be allowed.</li> <li>• <u>Add a Mineral and Strategic Mineral LUD, to the Plan to be consistent with National Security and National Strategic Mineral Policies,</u> to promote and support mineral and strategic mineral development and related access roads.</li> </ul> <p>Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE -2, RR-1, R-19, SOC 2-F, TRANS 4-A</p>
MAN 8-H	<p>The State recommends that the Transportation and Utility System LUD of the Forest Plan <u>recognize Canada's navigational rights on the Stikine River and reference the process by which Canada may request surface access through the Stikine River region in the Wilderness LUD, pursuant to Section 1113 of ANILCA and the Stikine River Region Access Study (1987).</u></p>

MAN 8-I	<p><u>The Forest Plan does little to respond to the disproportionate number of “warning signs,” per EO 12898, that indicate the adverse effects of the socio-economic disparity experienced by the rural communities living in poverty within the Tongass.</u></p> <ul style="list-style-type: none"> <li>• The three fundamental EO 12898 environmental justice principles are: 1. To avoid minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations. 2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process. 3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations</li> </ul>
MAN 8-J	<p><u>The reluctance of the USFS to approve aquaculture activities within the Tongass National Forest is contrary to the intent of the ANILCA.</u> Title 13, Section 1315 includes language that allows authorization of Aquaculture activities in Wilderness areas. ANILCA shows the expressed intent to allow for enhancement and rehabilitation of salmon in the National Forest as well as in wilderness areas.</p> <ul style="list-style-type: none"> <li>• (b) AQUACULTURE.--In accordance with the goal of restoring and maintaining fish production in the State of Alaska to optimum sustained yield levels and in a manner which adequately assures protection, preservation, enhancement, and rehabilitation of the wilderness resource, the Secretary of Agriculture may permit fishery research, management, enhancement, and rehabilitation activities within national forest wilderness and national forest wilderness study areas designated by this Act. Subject to reasonable regulations permanent improvements and facilities such as fishways, fish weirs, fish ladders, fish hatcheries, spawning channels, stream clearance, egg planting, and other accepted means of maintaining, enhancing, and rehabilitating fish stocks may be permitted by the Secretary to achieve this objective.</li> </ul> <p>Similar themes are found in SOCs: FISH 1-A&amp;B, FISH 2-A&amp;B, FISH 3-A&amp;B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K</p>
MAN 8-K	USFS management should be replaced entirely by USFWS.

## 4.45 TNF MANAGEMENT – GENERAL COMMENTS SUPPORTING THE TRANSITION (MAN 9)

Comments supporting implementation of the May 2010 Transition Framework on the Tongass, including comments more generally requesting a transition or “shift” from a focus old growth logging to more sustainable logging practices and young growth management, and/or to increasing support for industries such as fisheries, tourism and recreation, which commenters describe as more sustainable for the long-term, and comments calling for a concrete schedule to accomplish the Transition.

### 4.45.1 Comment Analysis

A total of 332 comments were submitted for this Topic of Concern; 75% (245) are from form letters with an additional unique substantive comment. Comments were submitted by representatives of the following entities: Alaska Audubon, Alaska Wilderness League, Central Council Tlingit and Haida Indian Tribes of Alaska, Defenders of Wildlife Earthjustice, Friends of Admiralty Island, League of Conservation Voters, National Audubon Society, Natural Resources Defense Council, Prince of Wales Community Advisory Council, Sierra Club, Sitka Conservation Society, Southeast Alaska Conservation Council, The Nature Conservancy, Trout Unlimited and from many unaffiliated individuals (generally associated with the form letters).

In addition to the form letters with unique comment that were included in the counts of commenters noted above, an additional 323,365 signatures/comments from seven form letter campaigns were submitted on Statement of Concern MAN 9-A. See the Submission Index on the last page of this document for more information.

The single SOC for this topic is about support for implementing the May 2010 Transition.

### 4.45.2 Statements of Concern

MAN 9-A	<p>Comments in <u>support of implementing the May 2010 Transition plan</u> that transitions the Tongass Forest away from old growth logging and focuses on young growth harvest, protects key remaining habitat, accomplishes restoration, and moves toward more sustainable economic development through restoration, renewable energy, fishing, recreation and tourism.</p> <ul style="list-style-type: none"> <li>• The May 2010 transition plan addresses a transition from old growth to young growth harvest management, and also "a broader suite of opportunities the Tongass can provide to support a diversified economy in Southeast Alaska", including restoration jobs, restoring habitat, energy, facilities, and trails.</li> <li>• Many comments specifically say, "implement the transition plan" to achieve more sustainable management of the Tongass, or refer to the USFS</li> </ul>
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“keeping its word” and following through with a transition in management. Many others refer more generally to making a transition or “shift” from old growth logging to more sustainable logging practices and/or to increasing support for industries such as fisheries, tourism and recreation, which commenters describe as more sustainable for the long-term. (NOTE: Comments that do not address a transition away from old growth logging, but address other sustainable industries, were grouped under the General Topic of Concern of Socioeconomics)

Specific comments regarding the transition include:

- Recommendation that the transition plan be implemented immediately, through a Forest Plan amendment, described as "narrow", "focused," "targeted" and "surgical" (rather than a comprehensive review of the entire Forest Plan). (Note that these comments are tabulated under MAN 9, but also relate to MAN 2 regarding the type of plan change needed.)
- Comments that it is not beneficial to invest time and effort in determining how the Forest Plan has been functioning up to now, when many aspects of the plan will change through implementation of the transition plan. Recommend that the Forest proceed with implementation of the transition plan without complicating and further delaying the transition by "folding all possible Forest Plan issues up in the same process".
- Concern that the current emphasis on large-scale old growth logging threatens the region’s main economic drivers of fishing and tourism, hurts local communities, restricts customary and traditional uses of the land, adversely impacts important fish, wildlife and watershed resources, and costs US taxpayers more than \$20 million annually in USFS expenditures in Forest Products and Roads.
- Comment that the Transition Framework will provide both jobs-in-the-woods (e.g. small scale mills, value-added), and conserve the region's natural resource base.
- Implementation of the transition plan will protect nearly all remaining Tongass old growth, which will eliminate deficiencies in the 2008 Forest Plan, including deficiencies related to risk to essential habitat, species important to customary and traditional users and hunters, as well as rare species that have been the subject of consideration under the Endangered Species Act; threats to areas of high recreation use.

## 4.46 TRANSPORTATION – ROAD MAINTENANCE (TRAN 1)

Includes comments made regarding road maintenance, closures, water-barring, storage, culvert-pulling or opening.

### 4.46.1 Comment Analysis

A total of 21 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Cascadia Wildlands, and Central Council Tlingit and Haida Indian Tribes of Alaska. Comments were submitted by Alaska Representative Peggy Wilson, the City of Ketchikan, and expressed at the Ketchikan public meeting and by unaffiliated individuals. No comments on this topic came from form letters.

More than three-quarters of all comments in this SOC were in TRANS 1-A, which expressed concern regarding Forest Service road closures. The other three SOCs received one to three comments each.

### 4.46.2 Statements of Concern

TRANS 1-A	<p><u>Forest Service roads should remain open and maintained.</u></p> <ul style="list-style-type: none"> <li>• In some cases, the primary value of the Forest Service’s management of the Tongass is the access that roads provide for local residents.</li> <li>• Road closures are unfair to Southeast Alaska residents who use the forest for recreation and hunting.</li> <li>• The Forest Service roads allow the Tongass to be a multi-use area. The roads allow access for berry pickers, woodcutters, photographers, hikers, and hunters; and the roads make the Tongass available for recreation and cultural uses.</li> <li>• Culvert removal results in 20-foot drops to creeks, making foot passage difficult for all, but especially for older individuals.</li> <li>• No one is expecting the Forest Service to maintain all the roads. Residents can knowingly travel the roads at their own risk and they can be posted.</li> <li>• Spending taxpayer money to destroy the roads seems inappropriate.</li> <li>• The Plan should allow for collaboration with local partners willing to sponsor portions of road maintenance.</li> <li>• The Forest Service states that culverts are being removed because they block fish passage and negatively impact watersheds. However, some of the road systems that are being closed are not connected to the watersheds below.</li> </ul>
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TRANS 1-B	<p><u>Government to government consultation in regards to Forest Service roads should apply to Southeast Tribes.</u></p> <ul style="list-style-type: none"> <li>As required by Executive Order 13175, federal agencies must consult with federally-recognized Tribes on any actions that may affect tribal interests. This applies to any agreements regarding Forest Service roads located within the traditional boundaries of a Tribe that are important for historic, cultural, and economic reasons such as subsistence.</li> </ul>
TRANS 1-C	<p>The US Forest Service should amend the Forest Plan to recognize the proposed Vallenar Bay Road and include it on the Land Use Designation Map.</p>
TRANS 1-D	<p>Existing Forest Service roads require maintenance, and funding for that maintenance needs to be made available. Road condition surveys are not being done as required.</p>

## 4.47 TRANSPORTATION – ORV/ATV (TRAN 2)

Comments about Off Road Vehicles (ORV) or All-Terrain Vehicle (ATV) trails, use, or management.

### 4.47.1 Comment Analysis

Two comments were submitted on this topic, by the City and Borough of Wrangell and the Juneau Audubon Society. No comments on this topic came from form letters.

One comment was in favor of keeping roads open for ATV use, while the other comment said that more oversight should be provided for snowmobiling, helicopter tours, and jet boating.

### 4.47.2 Statements of Concern

TRANS 2-A	Adjust budget allocations to spend more on recreation and tourism, major uses of the Tongass, and a primary way that the forest contributes to the local economy in Southeast communities. <u>Provide more oversight of recreational uses that could impact wildlife such as snowmobiling, helicopter tours, and jet boating and continue to promote recreational uses that have limited effect such as hiking trails, cabins and educational displays.</u>
TRANS 2-B	<u>Some roads should be kept open for ATV use, with minimal maintenance requirements. The Plan should allow for collaboration with local partners willing to sponsor portions of road maintenance.</u>

## 4.48 TRANSPORTATION – TRAVEL MANAGEMENT PLANS, ACCESS (TRAN 3)

Comments about the Access and Travel Management planning process and completed plans, other roads, or other transportation related planning efforts.

### 4.48.1 Comment Analysis

A total of 31 comments were submitted on this topic. This included comments from representatives of the following entities: Alaska Electric Light and Power Company, Alaska Power and Telephone, Cascadia Wildlands, Douglas Indian Association, First Things First Alaska Foundation, Juneau Chamber of Commerce, Ketchikan Chamber of Commerce, Sealaska, Southeast Alaska Power Agency, and Southeast Conference.

Comments were submitted by US Senator Lisa Murkowski, Alaska Representative Cathy Munoz, former Governor and former Senator Frank Murkowski, the City and Borough of Juneau, Ketchikan Gateway Borough, the City and Borough of Wrangell, expressed at the Craig public meeting, and submitted by unaffiliated individuals. No comments on this topic came from form letters.

Most (80%) of the comments in this SOC were divided into three categories: TRANS 3-B, which emphasizes that large scale hydro projects need road access to build projects; TRANS 3-C explains that the transportation network throughout the Tongass is very important and that more transportation corridors throughout it are needed; and TRANS 3-A, which notes that the development of recreation and tourism facilities should occur in conjunction with state and federal highway development. The other five SOCs received one to two comments each.

### 4.48.2 Statements of Concern

TRANS 3-A	<u>Plan for development of recreation and tourism facilities in conjunction with the planning of state and federal highways.</u>
TRANS 3-B	<u>There is no mention of the impact that prohibiting road construction will have on hydropower construction in the Plan.</u> Hydro projects are major construction projects that require road access for heavy machinery and equipment (for example, the generators at Tyee weigh 30 tons). A hydro-power project cannot be constructed with helicopters alone. The prohibition on road construction adversely effects development in Southeast Alaska and means that no new hydro projects will be built in Roadless areas. The 2008 Forest Plan needs to be modified to take into better account updates to the State of Alaska's Southeast Transportation Plan and the Alaska Energy Authority's 2011 Southeast Regional Integrated Power Plan. The plan needs to permit access for road links where needed in the region, examples include: <ul style="list-style-type: none"><li>• The Bradfield Canal road to Canada</li></ul>

	<ul style="list-style-type: none"> <li>• A road to permit lower-cost power transmission between Kake and Petersburg</li> <li>• A road to permit cheaper construction of a power line to access Soule River (Hyder) hydroelectric development.</li> <li>• Road access to allow SEAPA to maintain its generation and transmission facilities.</li> </ul>
TRANS 3-C	<p><u>The transportation network throughout the TNF is very important to its inhabitants who rely on it for access to work, subsist, hunt, recreate and other important activities.</u> More transportation corridors throughout the Tongass are needed to provide access to transportation links, resources, uplands, and tidewater. The US Forest Service should <u>amend the Forest Plan to recognize several roads, or proposed roads, including:</u></p> <ul style="list-style-type: none"> <li>• A land access route to Blank Inlet,</li> <li>• The proposed Vallenar Bay Road,</li> <li>• A road up Lynn Canal linking Juneau with rest of the State</li> <li>• More roaded development LUDs in Prince of Wales.</li> <li>• Access to potential mineral sites.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS-LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>
TRANS 3-D	<p>Use modified management techniques and newer management prescriptions to <u>allow the broadest access possible while still providing protection for roads that the Forest Service can no longer maintain.</u></p>
TRANS 3-E	<p>When <u>illegal road culverts are encountered in the planning process , it is mandatory that they be fixed.</u></p>
TRANS 3-F	<p>Any <u>agreements regarding Forest roads must include the Tribe with whom the territorial boundary encompasses.</u></p>
TRANS 3-G	<p><u>The road density standard should be clarified to establish 0.7 mi/sq. mi. as a meaningful threshold.</u> Where there are road---related mortality concerns, 0.7 mi per sq. mi. should be a target road density.</p>
TRANS 3-H	<p>The plan should <u>allow flexibility for adjusting the designation of routes at the local level during a project review.</u></p>
TRANS 3-I	<p>There should <u>not</u> be a road corridor through the Baranof Warm Springs and Baranof Lake area.</p> <p>Similar themes are found in SOCs: ENER 3-T, REC-8, TRANS 3-I</p>

## 4.49 TRANSPORTATION – OTHER (TRAN 4)

Transportation comments that are not TRAN 1, TRAN 2, or TRAN 3, including comments related to helicopters, motorized versus non-motorized use, or other access concerns.

### 4.49.1 Comment Analysis

A total of six comments were submitted for this topic. Comments were submitted by US Senator Lisa Murkowski, the City of Ketchikan, the US Forest Service; and expressed by unaffiliated individuals. No comments on this topic came from form letters.

There was one comment each for the six SOCs.

### 4.49.2 Statements of Concern

TRANS 4-A	<p><u>The prohibition on road construction adversely effects development in Southeast Alaska and means that no new hydro projects will be built in Roadless areas.</u> The requirements of the roadless rule must be waived in the Tongass for transportation and energy access. The original rule always intended to permit some roads needed as part of a transportation network and to support other forms of economic development. The 2008 Forest Plan needs to be modified to take into better account updates to the State of Alaska's Southeast Transportation Plan and the Alaska Energy Authority's 2011 Southeast Regional Integrated Power Plan. The plan needs to permit access for road links where needed in the region, examples include:</p> <ul style="list-style-type: none"> <li>• The Bradfield Canal road to Canada</li> <li>• A road to permit lower-cost power transmission between Kake and Petersburg</li> <li>• A road to permit cheaper construction of a power line to access Soule River (Hyder) hydroelectric development.</li> </ul> <p>Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE 2, RR-1, R-19, SOC 2-F, TRANS 4-A</p>
TRANS 4-B	<p>The US Forest Service should amend the Forest Plan to recognize a land access route to Blank Inlet.</p>
TRANS 4-C	<p><u>The practice of reducing the Recreation Opportunity Spectrum (ROS) Class for a particular location in Outfitters Guidelines from primitive or semi-primitive non-motorized to semi-primitive motorized is not appropriate for Southeast Alaska</u> because, although some motorized boats are used to access state-controlled tidelands, other non-motorized means of access are also used. This classification gives the impression that motorized vehicles can be used on national forest land possibly disturbing anadromous streams, wetlands, beaches</p>

	<p>and uplands. Once a person (or group) reaches national forest land their mode of access is typically by foot. This designation should be dropped from ROS classification in the Tongass.</p> <p>Similar themes are found in SOCs: ENER 3-M, MAN 5-C, REC-1, REC-6, TOUR 1-D, TOUR 1-H, TOUR 3-B, TRANS 4-C</p>
TRANS 4-D	<u>Public safety should be considered as part of Forest Plan monitoring efforts.</u>
TRANS 4-E	<u>The Forest Service needs to honor the City of Kupreanof's commitment, through its ordinances and planning documents, to remaining a roadless community. There should be no Kake to Petersburg Access Road.</u>
TRANS 4-F	<p><u>Need a Right-of-Way plan</u> for roads and electrical transmission of renewable energy projects.</p> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS-LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>

## 4.50 VISITOR SERVICES – OUTFITTERS AND GUIDES (TOUR 1)

Comments about the management, monitoring, or permitting related to commercial outfitter and guide activities and tours including cruise ships, heli-skiing tours, snowmobiling tours, hiking tours, and similar activities. Also comments about Visitor Industry Cluster.

### 4.50.1 Comment Analysis

A total of 18 comments were submitted for this topic, including comments from representatives of the following entities: Alaska Wilderness League, Latitude Adventures LLC, and Un-Cruise Adventures.

Comments also came from the State of Alaska, City and Borough of Wrangell, City of Ketchikan; expressed at the Ketchikan and Petersburg public meetings; and by unaffiliated individuals. One comment on this topic came from a form letter.

Half of all comments for this topic were in the concern area TOUR 1-A, noting that Tongass management should be more focused on the visitor industry. The other eight SOCs received one to two comments each.

### 4.50.2 Statements of Concern

TOUR 1-A	<p><u>The Tongass should be managed to promote a successful visitor industry.</u></p> <ul style="list-style-type: none"><li>• The current Tongass Plan recognizes recreation and tourism as one of many sectors of southeast Alaska’s regional economy. However, the current level of focus inadequately meets the needs of this sector.</li><li>• The Tongass should be managed for the long-term sustainability of the visitor industry and ecotourism. The Tongass National Forest Recreation and Wilderness staff needs more funding and resources. Increase expenditures for the tourism program areas.</li><li>• In order to better manage the Tongass for the visitor industry, the following should be considered relative to the Recreation and Tourism Forest-wide Goals and Objectives (TLMP, 2-6):<ul style="list-style-type: none"><li>○ Establish a 2-3 year permit planning cycle allowing for operators to best meet and plan for out year operations;</li><li>○ Evaluate and seek to meet the increased demand for commercial recreation services across the Forest;</li><li>○ Develop an integrated implementation strategy which could include the following: increase capacity at hardened recreation sites that are near or over current demand for service days, identify sites/projects where increased demand or existing/sustained use may warrant the development of new trails, disperse use in remote areas to minimize impacts on environment;</li></ul></li></ul>
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	<ul style="list-style-type: none"> <li>○ Undertake site-specific evaluation of use areas relative to current levels of use, desired levels of use, potential for increased demand, and current condition of recreation facilities/trails;</li> <li>○ Develop in coordination with other partners (industry, communities, NGOs, Tribes, etc.) a forest-wide set of priority recreation projects (i.e. facility/trail development or maintenance).</li> </ul>
TOUR 1-B	<u>Visitor management should be based on sub-regions rather than being applied forest wide.</u> Project area plans or district plans should analyze their own carrying capacity issues for various recreational opportunities.
TOUR 1-C	Provide more funding or reallocate funding to <u>enable guides and outfitter in the Tongass to obtain permits in a timely manner.</u>
TOUR 1-D	<p><u>Request Recreation Opportunity Spectrum (ROS) be changed to increase the number of groups and group size per day allowed in areas classified as Primitive (2008 plan, Appendix I). Alternatively, reclassify Non-Wilderness Primitive areas to Semi-Primitive non-motorized. An alternative to increasing group size and per day limits for the Primitive ROS, would be for the Forest Service to reclassify more Non-Wilderness Primitive areas to Semi-Primitive non-motorized.</u></p> <p>Similar themes are found in SOCs: ENER 3-M, MAN 5-C, REC-1, REC-6, TOUR 1-D, TOUR 1-H, TOUR 3-B, TRANS 4-C</p>
TOUR 1-E	<u>Do not reduce access to the Misty Fjords National Monument, Traitors Cove Viewing Observatory.</u>
TOUR 1-F	<u>Continue to support groups such as the Visitor Industry Cluster Working Group</u> in order to engage outside partners, identify gaps in implementation, and seek opportunities to better advance mutual goals and objectives.
TOUR 1-G	For areas <u>where the landscape is already modified, support restoration and other enhancement activity that would be beneficial to commercial recreation activity.</u>
TOUR 1-H	<p>Do not include the Tongass in the Recreation Opportunity Spectrum (ROS) designations, whose land use designations and thresholds for the level of use considered acceptable in “primitive” watersheds do not fit this place, its wildlife, or its people. <u>Replace the ROS system with a Tongass-based plan.</u></p> <p>Similar themes are found in SOCs: ENER 3-M, MAN 5-C, REC-1, REC-6, TOUR 1-D, TOUR 1-H, TOUR 3-B, TRANS 4-C</p>
TOUR 1-I	The USFS administratively determines the commercial services that are "necessary" pursuant to Section (d)(6) of the Wilderness Act. <u>Given the extensive amount of designated wilderness on the TNF, the State is concerned that the overly conservative process is further eroding economic opportunities in Southeast Alaska.</u>

## 4.51 VISITOR SERVICES – GUIDED HUNTING (TOUR 2)

Comments about the management, monitoring, or permitting related to guided hunting.

### 4.51.1 Comment Analysis

A total of two comments were submitted for this topic; one from the Petersburg public meeting and one from an unaffiliated individual. No comments on this topic came from form letters.

One comment spoke in favor of managing for deer habitat so viable hunting populations could return. The other comment was that no trophy hunting should be permitted on the Tongass.

### 4.51.2 Statements of Concern

TOUR 2-A	Tongass should be <u>managed for deer habitat so viable hunting populations returned to the Petersburg area.</u>
TOUR 2-B	<u>No trophy hunting</u> should be permitted on the Tongass.

## 4.52 VISITOR SERVICES – OTHER (TOUR 3)

Other comments about commercial services for visitors.

### 4.52.1 Comment Analysis

A total of 16 comments were submitted for this topic. This included comments from representatives of the following entities: Alaska Electric Light and Power Company, Alaska Power and Telephone, First Things First Alaska Foundation, the Juneau Audubon Society, Southeast Conference, and Trout Unlimited.

Comments were submitted by Alaska Representative Cathy Munoz, former Governor and former Senator Frank Murkowski, the City and Borough of Juneau, the Ketchikan Chamber of Commerce; expressed at the Juneau Petersburg public meeting and by unaffiliated individuals. Three comments on this topic came from form letters.

The comments in this TOC were split evenly among TOUR 3-A, noting that Tongass management should be more focused on the visitor industry, and, TOUR 3-B, supporting the management of recreation and tourism in accordance with updated Recreation Opportunity Spectrum guidelines and urging that recreation and tourism facilities be planned in conjunction with other development.

### 4.52.2 Statements of Concern

TOUR 3-A	<p><u>The Tongass should be managed to allow for a successful visitor industry.</u></p> <ul style="list-style-type: none"> <li>• Recreation and tourism are primary uses of the Tongass. Tourism provides significant economic benefits.</li> <li>• The Tongass should redirect resources to projects designed to promote the tourism industry.</li> <li>• Management should provide more oversight of recreational uses that could impact wildlife such as snowmobiling, helicopter tours, and jet boating and continue to promote recreational uses that have limited effect such as hiking trails, cabins and educational displays, and habitat for wildlife that generates tourism in the Tongass.</li> </ul>
TOUR 3-B	<p>Manage recreation and tourism in accordance with updated Recreation Opportunity Spectrum (ROS) guidelines. <u>Consider the development of recreation and tourism facilities in conjunction with highways, or Renewable Energy Resource projects.</u></p> <p>Similar themes are found in SOCs: ENER 3-M, MAN 5-C, REC-1, REC-6, TOUR 1-D, TOUR 1-H, TOUR 3-B, TRANS 4-C</p>

## 4.53 WILDLIFE CONSERVATION STRATEGY - STANDARDS & GUIDELINES (WCS 1)

Comments about Standards & Guidelines (S&Gs) related to wildlife conservation; Management of the Matrix (area between the Old Growth Reserves).

### 4.53.1 Comment Analysis

A total of 85 comments were submitted for this topic. This included comments from representatives of the following entities: Alaska Audubon, Alaska Wilderness League, Cascadia Wildlands, Defenders of Wildlife, Earthjustice, League of Conservation Voters, National Audubon Society, Natural Resources Defense Council, Pacific Fishing, Inc., Sealaska Corporation, Sierra Club, Southeast Alaska Conservation Council, Southeast Conference, The Nature Conservancy and Trout Unlimited.

Comments were also submitted by Alaska State Representative Cathy Munoz, the US Forest Service, US Fish and Wildlife Service, University of Alaska – Fairbanks, by a commenter at the Petersburg public meetings, and by unaffiliated individuals. There were 14 comments on this topic that were unique substantive additions to a form letter.

In addition to the form letters with unique comments that were included in the counts of commenters noted above, an additional 26,612 signatures/comments from two form letter campaigns were submitted on Statement of Concern WCS 1-A See the Submission Index on the last page of this document for more information.

There were 49 comments (58% of all) submitted on WCS-1-A, urging the Forest Service to uphold and strengthen the wildlife conservation strategy for a number of reasons (focusing on standards and guidelines). Another 13 comments (15%) were specifically about the effectiveness of the conservation strategy for the Alexander Archipelago wolf (WCS 1-C), and 11 comments were similarly about the Queen Charlotte goshawk (WCS 1-B). The remainder of the SOCs for this topic had one or two comments each.

### 4.53.2 Statements of Concern

WCS 1-A	<p><u>General comments in support of upholding and strengthening the wildlife conservation strategy.</u> Noted by some, including the USFWS, that the strategy has been effective in keeping species such as the Queen Charlotte goshawk and Alexander Archipelago wolf from being listed as threatened or endangered under the Endangered Species Act. Also noted that the conservation strategy is essential as long as old growth is being harvested, and will be even more important if land trades occur that move some old-growth habitat out of the Tongass. Comments regarding the need to generally improve or strengthen the conservation strategy include:</p> <ul style="list-style-type: none"><li>• Concern that implementation of Standards &amp; Guidelines in the matrix are</li></ul>
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	<p>often not effective (e.g., wolf Standards &amp; Guidelines related to deer population density, road density, and wolf management planning have not been consistently applied). The inadequacy of the Standards &amp; Guidelines in the matrix argue for importance of an effective reserve system for wildlife conservation (see WCS 2).</p> <ul style="list-style-type: none"> <li>• The Forest Service and State of Alaska operate as if matrix protections are optional, and that the presence of reserves assures species viability. When matrix Standards &amp; Guidelines are violated, the impact on the underlying species viability determinations is never re-examined.</li> <li>• General concern that, even with the protection of Roadless areas in recent years, the wildlife conservation strategy is failing to ensure healthy, abundant populations of important species, and to meet the following 2008 Forest Plan objective: "Provide sufficient habitat to preclude the need for listing species under the Endangered Species Act, or from becoming listed as Sensitive due to National Forest habitat conditions (2008 Forest Plan, p. 2-4).</li> <li>• The strategy needs to be revised in response to new information, such as recent studies on wolf genetics, goshawk habitat, bear mortality, deer survivability in timber harvest areas, northern flying squirrel and Keen's Myotis bat. (See DATA-A and SCIENCE-C for reference to specific publications.)</li> <li>• Any changes to the wildlife conservation strategy must be driven by best available science and be conducted by a credible interagency scientific review team.</li> <li>• Guidelines that suggest conservation design elements should be "considered" are not effective. This language should be strengthened to ensure appropriate conservation measures are usually applied, not only considered.</li> <li>• There has been slow erosion in the effectiveness of the strategy through interpretation. In particular, since the Roadless Rule has been in place, there has been more pressure to do the minimum necessary to meet Standards &amp; Guidelines. The USFS needs to do more to uphold the intent and integrity of the strategy.</li> <li>• Rather than focusing on minimum species viability and avoiding listing under the ESA, the strategy should seek to provide abundant populations with ample opportunity to fish and hunt – for recreation, commercial use, and subsistence.</li> <li>• The strategy review should take into account island-specific wildlife conservation concerns, particularly south of Fredrick Sound. A forest-wide</li> </ul>
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	<p>review could mask serious impacts to healthy wildlife populations on individual islands.</p> <ul style="list-style-type: none"> <li>• The Tongass should consider measures that would strengthen the wildlife conservation strategy, such as habitat restoration or other active management that would expedite development of second growth into suitable dispersal or breeding habitat, especially in areas where new science indicates old-growth elements are not functionally connected or insufficient habitat exists.</li> </ul>
WCS 1-B	<p>Comments regarding to the need to strengthen the wildlife conservation strategy's effectiveness in conserving the <u>Queen Charlotte goshawk</u>:</p> <ul style="list-style-type: none"> <li>• Recommend adding a sentence to the goshawk Standards &amp; Guidelines to clarify that where adequate old growth forest does not exist around a goshawk nest, at least 100 acres of the largest available trees should be protected, to provide suitable habitat around the nest.</li> <li>• With the increasing emphasis of young growth management on the Tongass, a review the 2008 Forest Plan Northern Goshawk Standards &amp; Guidelines in relation to young growth management and goshawk ecology and conservation is needed to provide clear guidance for how to manage nests found in young growth.</li> <li>• The 2008 Forest Plan includes a Standard &amp; Guideline (p. 4-99) that allows for protection measures to be removed from probable nest stands if, after two consecutive years of monitoring, there is no evidence of confirmed or probably nesting. This Standard &amp; Guideline should be removed, as it puts goshawk nest stands at risk. Goshawk pairs may leave nest stands in poor prey or weather conditions, but typically re-occupy traditional nest stands when favorable conditions return.</li> <li>• The 2008 Plan appears to drop several elements of the 1997 Conservation Strategy, thereby providing goshawks fewer protections. The 2008 Plan drops the 1997 Plan requirement that, in heavily-logged areas in northern and central POW, “an average of at least 8 large (20 to 30 inches diameter at breast height [DBH]) trees/acre are retained at harvest.” The 2008 Plan also reduces protections for nest stands by “[c]hang[ing] the goshawk nesting habitat standard and guideline for confirmed and probable nests to allow timber harvest or other activities if, based on annual monitoring, the nest site is found to be inactive for 2 consecutive years.” This change is not supported by scientific evidence, which indicates that: 1) goshawks are selective about where they build nests (Iverson et al. (1996), p. 37); 2) goshawks often return to reuse nesting areas after more than 2 years of inactivity (Flatten et al. (2001), p. 16), and “[l]ogging within and near nest stands has been implicated in nest site abandonment” (FWS, Status Report</li> </ul>

	<p>(2007), p. 62 (citing Crocker-Bedford (1990), Penteriani and Faivre (2001), Doyle and Mahon (2003), Mahon and Doyle (2005)). Further, the 2008 Plan relaxes restrictions on logging areas containing a known goshawk nest. The Plan allows logging to proceed so long as a 300 acre buffer is left around the nest site. 2008 Plan FEIS, p. D-31. However, based on observed use of alternate nest sites within nesting territories, Flatten et al. (2001) recommended that buffers of at least 1987 acres (804 ha) be used: "Based on our data from radio tagged adults, we conclude that increasing the size of buffers around known nests will provide greater integrity to nesting areas by protecting more distant (0.359-3.2 km) alternative nests that have a low probability of detection without the aid of radio telemetry." Id. at 3, 16-17.</p> <ul style="list-style-type: none"> <li>• Important assumptions and rationale underlying the determination that Southeast Alaska will continue to sustain a viable goshawk population are incorrect, outdated, and/or not based on the best available science. For example, the TNF has pointed to its 2008 Forest Plan's Conservation Strategy, which incorporates elements such as forest reserves, beach and estuary buffers, canopy retention requirements, and pre-project surveys. However, these measures leave goshawks at risk from continued decline, and some elements of the strategy lack sound scientific basis.</li> </ul>
WCS 1-C	<p>Comments regarding the need to strengthen the wildlife conservation strategy's effectiveness in conserving the <u>Alexander Archipelago wolf</u>:</p> <ul style="list-style-type: none"> <li>• Recommend that the Standard &amp; Guideline requiring development of a wolf habitat management plan be clarified to ensure that: 1) the wolf management plan process is actively implemented, 2) is based on the best available scientific evidence (including the determination of a wolf mortality concern that triggers the plan), and 3) is open to the public. This interagency planning process is a good model of what a dynamic strategy could be, but it has been a failure. In reality there is no such process. It was mandated as a result of litigation on the Logjam timber sale, but then ended before any substantive communication occurred and no progress was made.</li> <li>• The 18 deer per sq. mi. Standard &amp; Guideline for wolves needs to be clarified and bolstered. Specific comments include: <ul style="list-style-type: none"> <li>○ The Standard &amp; Guideline should be clarified to erase ambiguity as to whether the threshold can be crossed (recommend that it operate as a "fairly hard ceiling").</li> <li>○ Projects that would push areas below the threshold should not be allowed because they are a threat to wolf viability. Areas already below the threshold should not be further harvested.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ The threshold is routinely violated, meaning those areas no longer contain habitat sufficient to provide deer for both humans and wolves. This has been leading to State predator control, which further reduces the wolf population.</li> <li>○ It should be clarified that violating the deer density threshold cannot be compensated for by the presence of old growth reserve areas. To assure wolf viability, both the S&amp;G for deer density (fine filter) and the presence of reserves (coarse filter) are necessary.</li> <li>● The Standard &amp; Guideline regarding road density (WILD 1 XIV.A.1.c) should be based on open road density, not total road density. There is no reason to believe a closed non-drivable road will have the same effect as an open road. The road density standard should be clarified to establish 0.7 mi/sq. mi. as a meaningful threshold. Where there are road-related mortality concerns, 0.7 mi per sq. mi. should be a target road density. Additionally, it should be clarified that, on a project specific level, proposals that would bring road density over 0.7 mi/ sq mi should be understood to threaten wolf viability. Clarification would also be appropriate that road densities should be considered below 1,200 ft. in elevation, in accordance with the science behind it. The Forest Service has started to do a better job in making this correction on individual timber sales, but a Forest Plan clarification would be appropriate to maintain consistency.</li> </ul>
WCS 1-D	Request that a Standard & Guideline be included in the wildlife conservation strategy to provide a buffer for <u>bear</u> dens.
WCS 1-E	<p>Comments regarding Standards &amp; Guidelines for <u>Legacy Forest Structure</u> (2008 Forest Plan, p. 4-90).</p> <ul style="list-style-type: none"> <li>● Need to clarify whether the Standards &amp; Guidelines applies to 1) only the 49 VCUs listed in the Forest Plan (p. 4-90 and 4-91), or 2) any VCU with 33% or more of the 1954 Productive Old Growth (POG) harvested. Interpretation is not consistent across the Forest.</li> <li>● Clarify whether the 33% calculation includes or excludes non-National Forest System lands. The S&amp;G is silent on this point. Non-Forest Service lands appear to have been excluded from the calculation for the Forest Plan.</li> <li>● If the list of VCUs in the Forest Plan (p. 4-90 and 4-91) is intended to be the official list of VCUs to which the Standards &amp; Guidelines applies, then VCU 5980 needs to be added, since 35.5% of the 1954 POG was harvested in this VCU through 2006.</li> <li>● The list of VCUs for which 33% or more of the 1954 POG has been</li> </ul>

	<p>harvested should be updated periodically to ensure that these VCUs maintain their full range of functions in the matrix.</p> <ul style="list-style-type: none"> <li>• Two VCUs (5770 and 6220) have crossed over into having more than 33% of the 1954 POG harvested. The S&amp;G should be applied to these VCUs.</li> <li>• The percent of POG harvested should be referred to as 33%, not 33.0% (in tenths). Rounding to the nearest whole percent (e.g. 33%) is a more appropriate application of these data. Documentation exists to support that this issue had been identified earlier in the implementation of the 2008 Forest Plan and that the intent was to add these VCUs to the list as long as they did not impact the ASQ.</li> </ul>
WCS 1-F	<p>Rather than conduct a lengthy review and revision of the Wildlife Conservation Strategy, at this time, the Tongass should:</p> <ul style="list-style-type: none"> <li>• Use its discretion and resources to design and implement projects within the existing strategy that will protect and restore important fish and wildlife habitat.</li> <li>• Invest its energy into immediate implementation of the transition plan. With the goal of an old growth transition pending, reviewing past performance of the conservation strategy is very largely irrelevant.</li> </ul>
WCS 1-G	<p>Management Indicator Species – The conservation strategy should include coho salmon, sockeye salmon, steelhead and deer as Management Indicator Species.</p>
WCS 1-H	<p>Recommended consideration of an alternative conservation strategy:</p> <ul style="list-style-type: none"> <li>• Alternative management approach that uses an integrated resource management strategy whereby the land base is spatially managed for all resource objectives simultaneously taking advantage of forest dynamics and the capabilities of individual forest stands across the land base to meet varied resource objectives over time. Using such an approach enables the entire land base to contribute to all objectives, in contrast with dividing the land base up into zones or reserves that are only allowed to contribute to designated objectives. This proactive approach to forest management enables the development of conservation strategies that would improve the level of wildlife habitat protection over time (more total habitat and better distributed wildlife habitat). (see <a href="http://www.seconference.org">www.seconference.org</a>)</li> </ul>
WCS 1-I	<p>Concern that timber sales have been approved that are not in compliance with the Forest Plan’s wildlife conservation strategy (e.g., Mitkof Island, Lindenberg Peninsula).</p>
WCS 1-J	<p>Comments regarding Standards &amp; Guidelines for management of <u>Retention Areas</u>:</p> <ul style="list-style-type: none"> <li>• Given recent research providing effects of thinning on browse and shrub</li> </ul>

	<p>production in managed stands, the design of stream buffers and the Standards &amp; Guidelines applicable to their management should be reviewed. Standards &amp; Guidelines affecting their management should evolve from a general strategy of retention of existing conditions within an arbitrary distance to active management that achieves identified management goals on a site-specific basis.</p>
WCS 1-K	<p>Concern that the wildlife conservation strategy (both the Standards &amp; Guidelines and retention areas) and the way it has been implemented has impacted the timber supply necessary to support the current local industry, and is also impacting interest in investing in the additional infrastructure required to transition to young growth.</p>

## 4.54 WILDLIFE CONSERVATION STRATEGY - OLD GROWTH RESERVES (WCS 2)

Comments about Old Growth Reserves.

### 4.54.1 Comment Analysis

A total of 42 comments were submitted for this topic.

This included comments from representatives of the following entities: Alaska Forest Association, Alaska Wilderness League, Cascadia Wildlands, Natural Resources Defense Council, Sealaska Corporation, Sitka Conservation Society, Southeast Alaska Conservation Council, Southeast Conference, and Trout Unlimited.

Comments were also submitted by the City and Borough of Wrangell and the Port Protection Community Association, the US Forest Service, US Fish and Wildlife Service, University of Alaska – Fairbanks, by commenters at the Petersburg and Wrangell public meetings, and by unaffiliated individuals. There was one comment from a form letter.

Forty-five percent of all comments were for two SOCs. WCS 2-H, with 10 comments, identifies a number of changed conditions that may affect the wildlife conservation strategy and system of Old Growth Reserves. WCS 2-A, with nine comments, urges the Forest Service to uphold and strengthen the wildlife conservation strategy's network of old growth habitat reserves, in addition to connectivity through forest corridors. The remaining comments on this topic were well split, WCS 2- B and D had six or seven comments and the rest had one to four comments each.

### 4.54.2 Statements of Concern

WCS 2-A	<p>General comments in support of the <u>upholding and strengthening the wildlife conservation strategy's network of old growth habitat reserves, in addition to connectivity through forest corridors</u>.</p> <ul style="list-style-type: none"><li>• Specific comment by the USFWS noting that the strategy is a critical component of the Forest Plan that USFWS has relied on to support its decision not to list the Queen Charlotte goshawk or the Alexander Archipelago wolf as threatened or endangered in Southeast Alaska. Urge the USFS to carefully consider any modifications to the conservation strategy.</li></ul>
WCS 2-B	<p>The <u>existing system of Old Growth Reserves is not large enough</u> to adequately provide for wildlife conservation. Specific comments include:</p> <ul style="list-style-type: none"><li>• The system of Habitat Conservation Areas (HCA) is too small, fragmented, and disconnected to sustain a viable goshawk population in the Tongass or Southeast Alaska. This shortcoming was identified by the Forest Service's</li></ul>

	<p>Pacific Northwest Research Station, which conducted a peer review of the Interagency Viable Population (VPOP) Committee’s recommendation regarding the reserves. Without sufficient reserves, goshawks are in danger of becoming threatened, endangered, or extinct. The USFS and USFWS rely too heavily on the idea that acres of old-growth necessarily equal acres of goshawk habitat. A more accurate evaluation of remaining goshawk habitat will involve an assessment not only of the acres of old-growth left, but also the fragmentation, disproportionate logging, edge effects, connectivity, and volume classes associated with it, at the stand level.</p> <ul style="list-style-type: none"> <li>• Recently, on the Big Thorne project, an interagency team (USFS, USFWS, State of Alaska experts) was tasked with examining whether HCAs could be reduced or eliminated in consideration of habitat protected through the application of the Roadless Rule to the Tongass. The team concluded not, and also identified needed augmentation in the existing HCAs to adequately provide for wildlife conservation.</li> <li>• There are some small Old Growth Reserves that are totally ineffective for wildlife habitat (no specific examples given).</li> </ul>
WCS 2-C	<p><u>Regarding riparian and beach buffers:</u></p> <ul style="list-style-type: none"> <li>• The Forest Plan revisions need to include a section that evaluates all current buffer widths (coastal, riparian) relative to research and observations since 2008 and determine if those buffers should be maintained or changed. The new Forest Plan must include all the current research regarding buffers.</li> <li>• The Forest Plan should evaluate the last 15 years of free use timber data by district, volume and LUD to evaluate whether the requirement that free use timber be taken in OGRs and beach buffers only by a person living in a remote off-road location is being adhered to, and if there has been a change in pattern across LUDs through time.</li> </ul>
WCS 2-D	<p>The wildlife conservation strategy <u>does not adequately recognize the critical role of connectivity between conservation units (old growth reserves)</u>. Specific comments include:</p> <ul style="list-style-type: none"> <li>• The strategy does not recognize the role of habitat restoration in enhancing connectivity.</li> <li>• The only thing deer have to work with is a system of reserves .... [that] need to have connectivity. Otherwise they turn into predator traps.</li> <li>• More research is needed on the importance of connectivity, its influence upon wildlife, and its effectiveness.</li> <li>• One problem with the increasingly concentrated harvest areas is lack of tracking of wildlife corridors, which are essential to maintain connectivity</li> </ul>

	<p>between reserve areas and different habitats (e.g. upper and lower elevations). Timber sales are designed leaving small strips of remaining forest, which are expected to sustain connectivity. But then some years later the Forest Service returns and cuts those leave strips, without being able to consider or reconsider the assumptions of the earlier NEPA analysis. The initial assumption of the conservation strategy was that such leave strips would provide species mobility between OGRs. That assumption may not hold up if timber harvest is concentrated.</p> <ul style="list-style-type: none"> <li>• The corridors and buffers established in the conservation strategy are too narrow to provide adequate connectivity for goshawks or their prey. Originally the Interagency Viable Populations (VPOP) Committee recommended much larger buffers than those in the 2008 Forest Plan. In comments submitted in 1997, the VPOP Committee summarized the flaws: “[W]e found inadequate the alternative that included a 1,000 foot beach fringe . . . . Moreover, the beach fringes only connect areas between coastal habitat blocks, not those in the interiors of islands or the mainland. A 1,000 foot beach fringe is too narrow, subject to blowdown, and in at least some places is degraded by past logging. To provide secure wildlife movement among reserve areas (and to facilitate regular genetic interchange), corridor standards should at least be on the order of those described in Lande’s contribution to the 1994 Peer Review: a no cut zone of 2,000 feet in width.</li> <li>• The 2008 Forest Plan provides only for connectivity between large and medium OGRs (not small reserves). This further contributes to forest fragmentation and impacts goshawks and their prey.</li> </ul>
WCS 2-E	<p><u>Wildlife do not need old growth corridors (connectivity)</u>. They travel through young-growth stands with ease. Roads are also used heavily by deer, wolves, and bear.</p>
WCS 2-F	<p>The 2008 Forest Plan provides for the <u>modification of Old Growth Reserves</u>, through procedures included in Appendix K. Comments regarding the objective and process provided in the plan for modifying OGRs included:</p> <ul style="list-style-type: none"> <li>• As necessary, clarify in the Forest Plan that there is a process to modify OGRs at the project level.</li> <li>• Recent efforts to modify Reserves (e.g., Big Thorne, Wrangell Island, Saddle Lakes timber sales) have focused on moving the Reserves into Inventoried Roadless Areas. When Reserves are moved and redesigned, the design criteria in Appendix D of the Forest Plan must be applied. These criteria are critical to the functionality of the Reserve system and to the USFWS faith in its effectiveness. It is recommended that the "Criteria for Small OGRs" (Forest Plan, p. K-3) be clarified, to state that "Alternative small reserves must provide comparable conservation value, with respect to site specific</li> </ul>

	<p>factors named in Appendix D of the Final EIS, within each VCU."</p> <ul style="list-style-type: none"> <li>• Specific standards should be developed to assure that project level modifications to small OGRs provide comparable achievement of Old-Growth Habitat LUD goals.</li> <li>• Clarify whether and how the old growth reserve system can be adapted if there are changes in value in an existing old growth reserve, and another area is identified that would better meet the resource value objectives of the reserve.</li> </ul> <p>Some comments expressed concern that <u>some of the original reserve locations appear to have been selected specifically to avoid old-growth habitat and deer winter habitat</u> (allow for high-grade logging). Similarly, some cautioned that the Tongass should <u>avoid relocating old-growth reserves to facilitate timber sale planning</u>. In contrast, other commenters <u>request that the Tongass consider moving Old Growth Reserve locations to allow for additional harvesting capacity, particularly in light of additional areas protected under the Roadless Rule</u>.</p>
WCS 2-G	<p>The Forest Plan should <u>clarify that the Old Growth Reserve system does not compensate for non-achievement of a Standard &amp; Guideline</u>. For example, a Standard &amp; Guideline for wolves establishes a deer density threshold of 18 deer per square mile. To ensure wolf viability, the Tongass needs to provide both reserve areas of adequate size and quality and an adequate prey base (deer density) in the matrix. In the past, when logging had been proposed that reduces the deer Habitat Suitability Index (HSI) below the 18 deer per square mile threshold, the USFS has rationalized that nearby reserves are adequate to sustain viability. This is inconsistent with the scientific basis of the conservation strategy.</p>
WCS 2-H	<p>Commenters raised a number of <u>changed conditions that may affect the wildlife conservation strategy and system of Old Growth Reserves and should be considered</u> in any reevaluation:</p> <ul style="list-style-type: none"> <li>• Given imposition of the Roadless Rule on the Tongass, and the decision to transition from dependence on old growth for supplying the dependent industry with timber to young growth stands, all previously harvested acreage on the Tongass should be included in the timber base. Young growth timber previously contained in conservation areas and buffers should be omitted from any new conservation strategy and actively managed for timber.</li> <li>• The system of old growth reserves and buffers needs to be reevaluated, as the imposition of the Roadless Rule on the Tongass has significantly disrupted the balance in the Forest Plan between commodity production and retention areas. New conservation strategies need to be developed that take roadless areas into consideration. A range of alternatives should be developed and evaluated so impacts on various resource values can be</li> </ul>

	<p>compared.</p> <ul style="list-style-type: none"><li>• The impact of State predator control needs to be taken into account in evaluating the efficacy of the wildlife conservation strategy. State predator control occurs even in designated Wilderness reserves and other old growth reserves, which undermines the intent of those reserves to serve as sources of wolf dispersal into the matrix.</li><li>• The strategy needs to be revised in response to new information, northern flying squirrel and Keen's Myotis bat. See DATA-A and SCIENCE-C for more information and reference to specific publications.</li><li>• Potential future land transfers – Recommended that, to the extent possible, any land transfers out of the Tongass National Forest not be from within OGRs and beach buffers, which are important to a broad variety of wildlife. If transfers do affect Reserves, the USFWS can assist the USFS in identifying suitable replacement acres.</li></ul>
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## **4.55 MISCELLANEOUS – ACKNOWLEDGE (ACKN)**

The entire comment submission determined not to be substantive and warranted only a “comment acknowledged” response and/duplicate comments.

### **4.55.1 Comment Analysis**

A total of 23 comment submissions were determined not be substantive (17 submissions) or did not contain any comment when submitted through the website (six submissions). If this category of submission referred to a document that should have been attached, we verified that the document was received in a subsequent submission.

### **4.55.2 Statements of Concern**

ACK 1-A	No comments attached when submitted through website.
ACK 1-B	Comment was determined not to be substantive.

## 4.56 MISCELLANEOUS – EDITORIAL (EDIT)

Comments with specific text edits.

### 4.56.1 Statements of Concern

MISC – EDIT 1	<p>The Forest Plan needs updates to Appendix D to reflect recently updated channel types (mostly terminology changes) and corrections to Fish and Transportation S&amp;Gs to replace ADNR with ADF&amp;G for instream work concurrence (Title 16)--and should refer to cooperative agreements with state.</p> <ul style="list-style-type: none"> <li>• Incorporate reference to USFS National Core BMPs (2012)</li> <li>• ADEC has changed the nomenclature for Public Water Systems; change in Forest Plan is needed to match (page 4-66).</li> <li>• Channel type nomenclature has changed (Appendix D)</li> <li>• Title 16 language (instream work concurrence has reverted from ADNR back to ADF&amp;G)</li> </ul>
MISC – EDIT 2	<p>17-pages of suggested edits to the Wilderness and National Monument Wilderness LUD were submitted. This detailed track-changes listing of deletions and additions to the LUD language is attached beginning on page 4-213. (Submission ID #125006)</p>
MISC – EDIT 3	<p>Update the numbering in Wildlife WILD 1 "subsections" in each LUD "Apply the following Forest-wide S&amp;Gs located in Chapter 4" Table. The listed wildlife numbers do not match what is currently in the wildlife section of Chapter 4.</p> <ul style="list-style-type: none"> <li>• Example: Semi-Remote LUD pg. 3-64 states WILD 1, IX (A.1-8; 11, B) applies yet in Chapter 4 pg. 4-82 IX.A only has subparts 1-6.</li> </ul> <p>Correct the mountain goat standard and guideline WILD1.XV.A.3 (pg. 4-96). Definition should be escape terrain (greater than 50 degree slope or cliff) not (greater than 50 percent) as the S &amp; G currently states.</p> <ul style="list-style-type: none"> <li>• 50 degrees (not percent) was used in the old mountain goat model (Suring et al. 1988) based upon research by Kuck 1973, Smith 1976, McFetridge 1977a, Fox 1978, Schoen and Kirchoff 1982.</li> </ul>
MISC – EDIT 4	<p>In a review of Table E-1 (Approved Communication Sites on the Tongass National Forest) in Appendix E (Communication Sites) the following errors in the Site Location information. The corrected items are highlighted in yellow.</p> <p style="text-align: center;"><b>Cape Fanshaw Communication Site</b></p> <p><b>Current Site Location information:</b> SE4, Sec. 10, T54S, R75E, CRM</p>

	<p>57° 12' 22" N, 133° 28' 07" W. (State selection land but still in US Govt. ownership as of 11/2006)</p> <p><b>Correct Site Location information:</b>  NE4, Sec. 10, T54S, R75E, CRM  57° 12' 17" N, 133° 27' 55" W (State selection land but still in US Govt. ownership as of 11/2006)</p> <p style="text-align: center;"><b>Farragut Peak Communication Site</b></p> <p><b>Current Site Location information:</b>  NE4, Sec. 8, T55S, R78E, CRM  75° 07' 22" N, 133° 02' 35" W</p> <p><b>Correct Site Location information:</b>  NE4, Sec. 8, T55S, R78E, CRM  57° 07' 22" N, 133° 02' 35" W</p>
MISC – EDIT 5	The "Criteria for Small OGRs" (Forest Plan, p. K-3) should be clarified, to state that "Alternative small reserves must provide comparable conservation value, with respect to site specific factors named in Appendix D of the Final EIS, within each VCU." Using the term "comparable", rather than "identical" or "equal" allows for flexibility in which factors to include in alternative Reserves.
MISC – EDIT 6	The Forest Plan is ambiguous on how to proceed where there is less than 100 acres of productive old-growth forest surrounding a goshawk nest. This ambiguity should be corrected.
MISC – EDIT 7	<p>The following amendments should be made to the Plan: The term "reasonable access" should be defined to provide timely issuance of Forest Service Special Use Permits for those that hold a mining claim or a Federal Energy Regulatory Commission (FERC) preliminary permit to authorize these operations to investigate and develop lawfully permitted federal resources.</p> <p>Similar themes are found in SOCs: ENER 3-X, MAN 2-K, MAN 8-B, MINE 3, MISC-EDIT 7, RR-16</p>
MISC – EDIT 8	Statements (Appendix F) that the eastern DPS SSL is declining should be revised to reflect their increase.

## 4.57 MISCELLANEOUS – DATA (DATA)

Comments about data or specific studies for the USFS to incorporate into its analysis of the 2008 Forest Plan and as it considers any changes to the plan. (Note: Submission ID is provided so the USFS and others can go to the comment source for the full citation, data, and explanation of the reason the data or study was referenced.)

### 4.57.1 Comment Analysis

A total of 56 comments were submitted that recommended additional data or specific studies for the Tongass to consider in its analysis. This included comments from representatives of the following entities: Alaska Chapter of the Wildlife Society, Alaska Electric Light and Power Company, Alaska Forest Association, Alaska Power & Telephone Co., California Forestry Association, First Things First Alaska Foundation, Ketchikan Chamber of Commerce, Natural Resources Defense Council, Prince of Wales Community Advisory Council, Southeast Alaska Conservation Council, Southeast Conference, Trout Unlimited, United Southeast Alaska Gillnetters, and the University of Alaska Fairbanks. Comments were also submitted by Alaska State Representative Cathy Munoz and former Governor and former Senator Frank Murkowski; and the City and Borough of Juneau and the City of Ketchikan. No comments on this topic came from a form letter.

### 4.57.2 Statements of Concern

DATA-A	<p>Requested that the following additional data and studies be reviewed by the Forest Service during the Forest Plan review (Note: specifics about each set of data or study can be found in the submission noted below):</p> <p><u>General</u></p> <ul style="list-style-type: none"><li>• USDA Forest Service Organic Act (Submission ID 32)</li></ul> <p><u>Climate Change</u></p> <ul style="list-style-type: none"><li>• President’s Climate Action Plan, <a href="http://www.whitehouse.gov/sites/default/files/image/president27sclimateactionplan.pdf">http://www.whitehouse.gov/sites/default/files/image/president27sclimateactionplan.pdf</a> (Submission 179)</li><li>• Lovejoy, et al (2009), Letter to President Obama (Exhibit 4), (Submission ID 179)</li><li>• “Addressing Climate Change on the Tongass”, June 2010, (Exhibits 3 &amp; 5), (Submission ID 179)</li></ul> <p><u>Energy</u></p> <ul style="list-style-type: none"><li>• Alaska Energy Authority database regarding renewable energy development, <a href="http://www.akenergyinventory.org/downloads/HYD2011-2/HYD2011-2.kmz">http://www.akenergyinventory.org/downloads/HYD2011-2/HYD2011-2.kmz</a> (Submission ID 227)</li></ul>
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- Southeast Conference document regarding renewable energy resource land use designation, entitled "Renewable Energy Resource" (Submission ID 227)
- Southeast Conference memoranda on renewable energy, located at [www.seconference.org](http://www.seconference.org) (Submission ID 226)
- Energy Independence and Security Act of 2007 (Submission ID 572)
- Public Law 106-511 (Submission ID 572)

#### Fish Habitat

- The Tongass 77-Protecting Southeast Alaska's Best Salmon Watersheds (Submission ID 145)

#### Mining

- Southeast Conference memoranda on mining, located at [www.seconference.org](http://www.seconference.org) (Submission ID 226)

#### Roadless

- Roadless Area Inventory Map (Submission ID 143)

#### Timber

- Map 1 – Forest Land Selection (Submission ID 125)
- Mater Engineering, Final Report to Geos Institute on Options for Transitioning from Old Growth Logging to Second Growth Logging in S.E. Alaska (2013), p. 8 (Exhibit 2), (Submission ID 179)
- Southeast Conference memoranda on timber program, located at [www.seconference.org](http://www.seconference.org) (Submission ID 226)
- Statistics from Federal Timber Purchasers Committee meetings 2004-2012, regarding Sold Sawtimber Volume from the Tongass by year since 1997 (provided in Submission ID 8)
- Table (Attachment 2) – Forest Land Selection (Submission ID 125)
- Table: 2011 Shelf Volume Appraisal Summary (Submission ID 125, p. 4)
- Table: Tongass Timber Sale Procedures Consistently Miss the Mark (Submission 105)
- Tables AF-2 and AF-3, "Economic Analysis of Southeast Alaska, Envisioning a Sustainable Economy with Thriving Communities (USFS, R10-MB-725), (Submission ID 86)
- Table G-2, Tongass National Forest sale volume necessary to supply derived demand for decked log volume and chips, from Brackley et al, 2006 (Submission ID 125)

- Tongass Transition Framework, May 2010 (Exhibit 1), (Submission ID 179)
- USFS Response to SEACC's April 7, 2011 FOIA (May 5, 2011)(Logjam and Slake timber offerings); Response to 2011-TNF-029 SSO SEACC Change Analysis FOIA Request (August 18, 2011)(all change analysis summaries and tables for each timber sale project approved after approval of the 1997 Forest Plan (Submission ID 105)

#### Wildlife and Conservation Strategy

- General
  - Southeast Conference memoranda on alternative wildlife conservation strategy, located at [www.seconference.org](http://www.seconference.org) (Submission ID 226)
  - "Reducing Disease Risk to Dall's Sheep and Mountain Goats from Domestic Livestock" (Submission ID 126270)
  - Dillman, M., et al, Interagency Old Growth Reserve Review – Big Thorne Project, 2013 (Exhibit 6), (Submission ID 179)
  - Powell, et al, Joint Statement of Members of the Peer Review Committee Concerning the Inadequacy of Conservation Measures for Vertebrate Species in the Tongass National Forest Land Management Plan of Record, September 1997 (Exhibit 9), (Submission 179)
  - Smith, W.P. and P.A. Zollner, 2005. Sustainable management of wildlife habitat and risk of extinction. (Submission ID 109)
  - Smith, W.P., 2013. Spatially explicit analysis of contributions of a regional conservation strategy toward sustaining essential wildlife habitat. (Submission ID 109)
- Scientific information and publications related to Keen's Myotis:
  - Boland, et al, 2009. Selection of day roosts in trees by male and female Keen's Myotis (*Myotis keenii*) at multiple spatial scales (Submission ID 109)
- Scientific information and publications related to Northern flying squirrels:
  - Flaherty, et al, 2008. Experimental trials of the northern flying squirrel (*Glaucomys sabrinus*) traversing managed rainforest landscapes: perceptual range and fine-scale movements. (Submission ID 109)
  - Flaherty, et al, 2010. Quadrupedal locomotor performance in two species of arboreal squirrels: predicting energy savings of gliding. (Submission ID 109)
  - Flaherty, et al, 2010. Diet and food availability of the endemic Prince of Wales flying squirrel (*Glaucomys sabrinus griseifrons*) in Southeast Alaska: implications for dispersal across managed landscapes. (Submission ID 109)
  - Pyare, et al, 2010. Den selection by northern flying squirrels in fragmented landscapes. (Submission ID 109)
  - Shanely, et al, 2012. Landscape requirements of an ecological indicator:

implications for functional units of temperate rainforest ecosystems (Submission ID 109)

- Smith, et al, 2011. Source-sinks, metapopulations, and forest reserves: conserving northern flying squirrels in the temperate rainforests of Southeast Alaska. (Submission ID 109)
- Smith, W.P., 2012. Flying squirrel demography varies between island communities with and without red squirrels. (Submission ID 109)
- Smith, W.P., 2012. Sentinels of ecological processes: The case of the northern flying squirrel (Submission ID 109)
- Smith, W.P. and D.K. Person, 2007. Estimated persistence of northern flying squirrel populations in old-growth rain forest fragments. (Submission ID 109)
- Scientific information and publications related to Stellar sea lions:
  - <http://alaskafisheries.noaa.gov/protectedresources/stellars/edps/status.htm>
- Scientific information and publications related to Queen Charlotte goshawks:
  - [http://ak.audubon.org/sites/default/files/documents/costs\\_of\\_s\\_340\\_-\\_report\\_to\\_congress\\_final.pdf](http://ak.audubon.org/sites/default/files/documents/costs_of_s_340_-_report_to_congress_final.pdf)
  - Crocker-Bedford, 1990 (Exhibit 11), (Submission ID 179)
  - Crocker-Bedford, 1994 (Exhibit 12), (Submission ID 179)
  - Doyle, 2005 (Submission ID 179)
  - Doyle and Mahon, 2003 (Submission ID 179)
  - Flatten, et al, 2001 (Exhibit 14), (Submission ID 179)
  - FWS, Queen Charlotte Goshawk Status Review, 2007 (Exhibit 7), (Submission ID 179)
  - FWS, Updated Appendices to Status Review, 2010, Table A-9 (Exhibit 10), (Submission ID 179)
  - Iverson, et al, 1996 (Submission ID 179)
  - Lewis et al, 2003 (Submission ID 189)
  - Mahon and Doyle, 2005 (Submission ID 179)
  - Penteriani and Fairvre, 2001 (Submission ID 179)
  - Schempf and Wood, 2000 (Exhibit 13), (Submission ID 179)
  - Shipley Group, Soule River Survey, 2009 (Exhibit 8), (Submission ID 179)
  - Smith, 2013 (Submission ID 189)

## 4.58 NEW SCIENTIFIC INFORMATION (SCIENCE)

Comments about scientific information that is new or has changed substantially since 2008. Support for use of best available science.

### 4.58.1 Comment Analysis

A total of 60 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Cascadia Wildlands, Central Council Tlingit and Haida Indian Tribes of Alaska, Friends of Admiralty Island, Natural Resources Defense Council, Pioneer Alaskan Fisheries, Inc., Sealaska Corporation, Sitka Conservation Society, Southeast Alaska Conservation Council, United Southeast Alaska Gillnetters, University of Alaska Fairbanks, and the US Forest Service. Comments also came from the City of Tenakee; from the Craig, Juneau, Ketchikan and Wrangell public meetings; and unaffiliated individuals. No comments on this topic came from a form letter.

Half of the comments addressed SOCs SCIENCE A or SCIENCE C, which (respectively) urge that updates to the forest plan and wildlife conservation strategy be based on the best available scientific information, and recommend the plan address new information related to wildlife. Nearly half of the comments related to the SCIENCE B, which asked that the forest plan address new information regarding climate change. The remaining SOCs received one to four comments each.

### 4.58.2 Statements of Concern

SCIENCE-A	General comments that the Forest Plan and wildlife conservation strategy need to be guided by the best available science. Additional comments urging that application of scientific facts not be filtered through a political lens.
SCIENCE-B	<p>The Forest Plan needs to address new scientific information regarding climate change, including:</p> <ul style="list-style-type: none"> <li>• role of forests in carbon sequestration, as carbon banks to mitigate impacts of excessive carbon emissions (including the potential to generate revenue for the forest through carbon banking)</li> <li>• importance of the forest in both the mitigation and adaptation aspects of climate change</li> <li>• effects of changing climate on cedar growth at high latitudes (and its effect on sustainable yield)</li> <li>• effects of changing climate on species distribution, forest composition, biodiversity</li> <li>• acidification</li> </ul>

	Similar themes are found in SOCs: ECO 1-A, ENER 3-E, ENER 3-W, MAN 7-B, MAN 8-E, RR-21, SCIENCE-B, TIM 9-I
SCIENCE-C	<p>The Forest Plan needs to address new scientific information regarding wildlife. Any change in the wildlife conservation strategy needs to be based on the best and most recent scientific information. Areas with new science since 2008 include:</p> <ul style="list-style-type: none"> <li>• wolves on Prince of Wales Island</li> <li>• wolf genetics</li> <li>• deer on Prince of Wales Island</li> <li>• goshawk (importance of mature second growth forest for habitat, viability, analysis of conservation strategy's contribution to maintaining habitat and connectivity for goshawk and its prey)</li> <li>• northern flying squirrels (den selection, effectiveness of old growth reserves in facilitating dispersal, diet and food availability, relative energy costs of locomotion and gliding, risk of predation, influence of red squirrel populations, role as an indicator species in SE Alaska temperate rainforest) - See DATA-A for specific publications list</li> <li>• Keen's Myotis bat (selection of day roosts) - See DATA-A for specific publications list</li> <li>• bear mortality and deer survivability in heavily clearcut landscape</li> <li>• increase in Stellar sea lion populations that have led to its delisting under the Endangered Species List in Southeast Alaska</li> </ul>
SCIENCE-D	<p>The Forest Plan needs to address new scientific information regarding silviculture, including:</p> <ul style="list-style-type: none"> <li>• effects of thinning on browse and shrub production in managed stands, and the effects on buffers and buffer management</li> <li>• effects of beetles</li> <li>• potential for managed forest lands to contribute to wildlife habitat</li> <li>• more research is needed on effectiveness of helicopter / retention harvested areas for habitat and its occupants</li> </ul>
SCIENCE-E	Recommendation that the revised Forest Plan include a specific strategy for conducting future scientific studies in partnership with scientists and scientific institutions.

## 4.59 LUD II (LUD II)

Comments on any issue related to Land Use Designation (LUD) II.

### 4.59.1 Comment Analysis

Four comments were submitted for this topic, by US Senator Lisa Murkowski, Southeast Alaska Fishermen’s Alliance, and by a commenter at the Craig public meeting. No comments on this topic came from form letters.

Three comments address LUD II- 1, stating that LUD IIs should only be used in the most critical habitat areas; the other comment notes that TTRA, which established the LUD IIs, allows fish hatcheries.

### 4.59.2 Statements of Concern

LUD II - 1	<p><u>Further designations of LUD IIs—or other restricted designations that restrict access or preclude opportunities for timberland planning, should be implemented only in the most critical of habitat-protection areas.</u> Revise permitted land uses and activities for LUD IIIs and LUD IIs to provide more reasonable access to these lands; the lack of this undercuts the Forest Service timber-land planning process. A return to a more simple land classification process is encouraged.</p> <p>Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE 2, RR-1, R-19, SOC 2-F, TRANS 4-A</p>
LUD II - 2	<p><u>Fish hatcheries should be allowed within LUD II boundaries.</u></p> <p>Part of the TTRA LUD II management purpose states that (2) Management Implications . . .Permanent improvements such as fish ways, FISH HATCHERIES (emphasis added) or aquaculture sites may be built. Appropriate landscape management techniques will be applied in the design and construction of such improvements to minimize impacts on recreational resources.</p>

## 4.60 LUD – NON-WILDERNESS NATIONAL MONUMENT (LUD-NW)

Comments about any issue related to Non-Wilderness National Monument Land Use Designation (LUD).

### 4.60.1 Comment Analysis

Only one comment was submitted for this topic, by Un-Cruise Adventures. No comments on this topic came from form letters.

### 4.60.2 Statements of Concern

LUD-NW 1	<u>As an alternative to increasing group size and per day limits for the Primitive Recreation Opportunity Spectrum, consider reclassifying Non-Wilderness Primitive areas to Semi-Primitive non-motorized.</u> Currently, commercial groups are limited to no more than 2 groups of 12 per day in areas classified as Primitive (TLMP, Appendix I).With vast landscapes classified as Primitive (i.e., all of South Baranof including non-Wilderness LUDs), this S/G is more restrictive than necessary to maintain the integrity of the landscape and recreation setting.
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## 4.61 LUD – OLD GROWTH HABITAT (LUD-OGH)

Comments on any issue related to Old Growth Habitat Land Use Designation (LUD).

### 4.61.1 Comment Analysis

A total of three comments were submitted for this topic. This included comments from representatives of the following entities: Southeast Alaska Conservation Council, the State of Alaska, and the US Fish and Wildlife Service. No comments on this topic came from form letters.

Two of the three comments addressed SOC LUD-OGH 1, noting that alternative and small old growth reserves should provide comparable achievement of Old Growth Habitat LUD goals and objectives within each VCU.

### 4.61.2 Statements of Concern

LUD-OGH 1	<u>Alternative and small old growth reserves, especially on islands, should provide comparable achievement of Old Growth Habitat LUD goals and objectives within each VCU.</u> A particular area of concern is Fredrick Island.
LUD-OGH 2	The Timber Resource Planning management prescription (TIM-4) for the Old-Growth Habitat LUD should <u>allow administrative use of timber.</u>

## 4.62 LUD – REMOTE RECREATION (LUD-RR)

Comments about any issue related to the Remote Recreation Land Use Designation (LUD).

### 4.62.1 Comment Analysis

A total of seven comments were submitted for this topic. This included comments from representatives of the following entities: First Things First Alaska Foundation and the Southern Southeast Regional Aquaculture Association.

Comments also came from US Senator Lisa Murkowski, former Governor and former Senator Frank Murkowski, the City and Borough of Juneau, the City of Ketchikan; expressed at the Ketchikan public meeting; and by an unaffiliated individual. No comments on this topic came from a form letter.

The comments in this TOC were divided among two categories: LUD – RR 1, noting that TNF must amend the Forest Plan since it determined that the TUS LUD cannot be applied to allow hydropower in the RR LUD; and LUD – RR 2, supporting a change of LUD status for Connell Lake to allow salmon rearing.

### 4.62.2 Statements of Concern

LUD – RR 1	The TNF has determined that the TUS LUD cannot be applied to allow hydropower in the Remote Recreation LUD (an “Avoidance LUD”), yet the TNF has not amended the Forest Plan to address this acknowledged need. This must occur.
LUD – RR 2	<u>The LUD for Connell Lake should be changed to allow for the rearing of salmon.</u> The SSRAA is a non-profit with the goal of improving salmon resources in Southeast Alaska. Connell Lake is on the road system and offers the best option for expansion of salmon stocked streams.

## 4.63 LUD – SPECIAL INTEREST AREA (LUD-SIA)

Comments about any issue related to Special Interest Area Land Use Designation (LUD).

### 4.63.1 Comment Analysis

A total of three comments were submitted for this Topic of Concern. This included comments from representatives of the Sitka Conservation Society and the Ketchikan Gateway Borough. No comments on this topic came from a form letter.

Two of the three comments in this TOC addressed LUD – SIA 1, requesting that the SIA LUD be amended to add the use of fish pens.

### 4.63.2 Statements of Concern

LUD – SIA 1	Amend the LUD for Special Interest Areas to add the use of fish pens, allowing, in particular, use of Connell Lake by the SSRAA for salmon stock pens.
LUD – SIA 2	Southern Kruzof Island should be designated as a Special Interest Area and a National Monument. This will support recreational, tourism, and subsistence use of the area.

## 4.64 LUD – SEMI-REMOTE RECREATION (LUD-SRR)

Comments about any issue related to Semi-Remote Recreation Land Use Designation (LUD).

### 4.64.1 Comment Analysis

A total of three comments were submitted for this topic. This included comments from the Southern Southeast Regional Aquaculture Association and as presented at the Ketchikan public meeting. No comments on this topic came from a form letter.

All comments addressed a single SOC: The LUD for Connell Lake should be changed to allow for the rearing of salmon.

### 4.64.2 Statements of Concern

LUD – SRR 1	<u>The LUD for Connell Lake should be changed to allow for the rearing of salmon.</u> The SSRAA is a non-profit with the goal of improving salmon resources in Southeast Alaska. Connell Lake is on the road system and offers the best option for expansion of salmon stocked streams.
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## 4.65 LUD – SCENIC VIEWSHED (LUD-SV)

Comments about any issue related to Scenic Viewshed Land Use Designation (LUD).

### 4.65.1 Comment Analysis

A total of seven comments were submitted for this topic. This included comments from representatives from the City and Borough of Wrangell and the US Forest Service, as well as comments expressed at the Petersburg public meeting.

Two comments each were about LUD – SV 1, asking that Scenery Creek be reclassified as a Remote Recreation LUD; and LUD – SV 2, asking that Petersburg Creek be reclassified to either Remote Recreation or Wilderness. The other three SOCs received one comment each.

### 4.65.2 Statements of Concern

LUD – SV 1	Scenery Creek should be reclassified as a Remote Recreation LUD.
LUD – SV 2	Petersburg Creek should be reclassified to either Remote Recreation or Wilderness.
LUD – SV 3	Certain Scenic Priority Routes are in unnecessary locations, such as Carroll Inlet, should be reclassified.
LUD – SV 4	Allow for the modification of Scenic Viewsheds and Scenic Priority routes at the project level.
LUD – SV 5	Refrain from reclassifying Scenic Viewsheds to Timber Production areas due to the pressures put on by reduced timber ground caused by the Roadless Rule.

## 4.66 LUD – TIMBER PRODUCTION (LUD-TP)

Comments about any issue related to the Timber Production Land Use Designation (LUD).

### 4.66.1 Comment Analysis

A total of three comments were submitted for this topic. This included comments from representatives of the Sitka Conservation Society, the US Fish and Wildlife Service, and the US Forest Service. No comments on this topic came from a form letter.

There was one comment for each of the SOCs.

### 4.66.2 Statements of Concern

LUD – TP 1	Include Ushk Bay and Poison Cove in the larger West Chichagof Wilderness Area. Don't designate this area as Timber Production.
LUD – TP 2	Reclassify areas that are not impacted by the Roadless Rule to Timber and Modified Landscape LUDs.
LUD – TP 3	<u>Focus on methods of timber production that improve habitat function.</u> Selective cutting and small patch cuts can increase deer forage while maintaining a canopy that creates a protective layer from snow. These treatments could be tested on Timber and Modified Landscape LUDs.

## 4.67 LUD – WILDERNESS & WILDERNESS NATIONAL MONUMENT (LUD-W)

Comments about changes related to the Wilderness & Wilderness National Monument Land Use Designation (LUD) or to the general topic of Wilderness.

### 4.67.1 Comment Analysis

A total of 33 comments were submitted for this topic. This included comments from representatives of the following entities: the Alaska Miners Association, Friends of Admiralty Island, the Sitka Conservation Society, the Southeast Alaska Fishermen's Alliance, and the US Forest Service.

Comments were also expressed at the Petersburg and Haines public meeting, and by unaffiliated individuals. No comments on this topic came from form letters.

Most (23) of the comments are part of LUD-W 4, a Forest Service employee submittal with track-changes edits to the Wilderness and National Monument Wilderness management prescription (17 pages). The other seven SOCs received one to three comments each.

### 4.67.2 Statements of Concern

LUD-W 1	<u>The LUD encompassing Petersburg Creek should be changed from Scenic to Remote (or Wilderness), and the Wild and Scenic River Designation recommendation to Congress should continue for the length of the creek.</u>
LUD-W 2	New hydropower and renewable energy projects needed to provide lower cost power to remote mining operations and rural communities throughout Southeast Alaska will likely be prohibited or made more difficult to access and develop if they are located in Wilderness areas and because the power lines needed to distribute that power will need to cross Wilderness areas. <u>Given the fact that there is 5.6 million acres of Wilderness in the Tongass National Forest, the 2008 Forest Plan should be amended to include a renewable energy resource plan.</u>
LUD-W 3	The 2008 Forest Plan should be amended order to provide for balanced resource development on the TNF. <u>The experience of the mining community is that Special Use Permits authorizing road access in or near Wilderness Areas are very difficult to obtain.</u> <ul style="list-style-type: none"> <li>For example, the Quartz Hill Project was adjacent to the Misty Fjords Wilderness Study Area. In 1977 the Forest Service denied a Special Use Permit to US Borax to construct a road for a bulk sample of 5,000 tons of ore at the Quartz Hill Project, requiring access to be by helicopter. SEACC v. Watson, 697 F.2d 1305 (9th Cir. 1983). As the opinion shows, six years later Borax still did not have a permit to build the road needed to move that volume of ore; [Footnote: 2. 66 Fed. Reg. 3244, 3264 January 12, 2001.]</li> </ul>

LUD-W 4	<u>The full Wilderness and National Monument Wilderness LUD is submitted (17-pages) with several recommended edits.</u> This detailed track-changes listing of deletions and additions to the LUD language is attached. See page 4-213.
LUD-W 5	<u>The Fish Habitat Planning: FISH 2 (3-11) section appears to be in contradiction of the Wilderness and National Monument Wilderness Goals on page 3-7.</u> The Fish Habitat Planning section is more in line with the legislative language of ANILCA.
LUD-W 6	A comprehensive plan is needed for the Admiralty Island National Monument and Kootznoowoo Wilderness that reflects those values detailed in the Presidential Proclamation, Legislation and Forest Plan.
LUD-W 7	<u>The Forest Service should nominate the Southern Kruzof Island area for a congressional designation as a National Monument.</u> The area should continue to have the same management prescriptions. A complimentary management and communications plan that will highlight the social/ecological/economic/historic importance of the area and more robust support of recreational, tourism, and subsistence use of the area should be developed.
LUD-W 8	<u>Wilderness is a benefit that to protect and preserve.</u> There are competing needs, such as timber harvest and mineral extraction, but wilderness also needs a place in the mix.

## 4.68 LUD – TRANSPORTATION & UTILITY SYSTEM OVERLAY (TUS-LUD)

Comments about changes to or an issue related to the Transportation and Utility System (TUS) overlay LUD, about existing and proposed state road corridors, and existing and proposed power transmission corridors.

### 4.68.1 Comment Analysis

A total of 42 comments were submitted for this topic. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power Company, Alaska Miners Association, Alaska Native Brotherhood Camp 70, Alaska Power & Telephone (several offices), Central Council Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, Juneau Chamber of Commerce, Kootznoowoo, Inc., Law Office of James F. Clark, Pacific Fishing, Inc., Prince of Wales Community Advisory Council, Prince of Wales Island Chamber of Commerce, and the Resource Development Council.

Comments also came from the Alaska Senator Bert Stedman, Alaska Representatives Cathy Munoz and Peggy Wilson, former Governor and former Senator Frank Murkowski, State of Alaska, the City of Craig, the City and Borough of Juneau, the City of Ketchikan, the Municipality of Skagway, the US Forest Service; were expressed at the Sitka and Wrangell public meetings; and submitted by unaffiliated individuals. No comments on this topic came from a form letter.

Almost 80% of all comments were either about TUS LUD-4 or TUS LUD-1. TUS-LUD 4 (18 comments) request that the Forest Service amend the TUS criteria to allow it to apply to additionally apply to private and tribal renewable energy projects. The 15 comments about TUS-LUD 1 ask the Forest Service to amend TUS criteria to apply to hydropower projects and all other renewable energy projects within TUS Avoidance Areas, and, state that TUS sites and corridors should overrule the underlying LUD.

### 4.68.2 Statements of Concern

Similar themes are found in SOCs: TUS-LUD (all SOCs), ENER 1-B&C, ENER 1-N, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F

TUS LUD-1	<p><u>Amend TUS criteria to allow the TUS LUD to apply to hydropower projects and all other renewable energy projects within TUS Avoidance Areas. TUS sites and corridors should overrule the underlying LUD.</u></p> <ul style="list-style-type: none"> <li>• Many of the 200+ renewable energy sites in the TNF require access to develop and are in the TUS Avoidance LUDs, such as Remote Recreation LUD, which severely restricts access.</li> <li>• To see possible projects refer to Draft Southeast Integrated Resources Plan (SEIRP) and the 1947 Water Powers of Southeast Alaska Report.</li> </ul>
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TUS LUD-2	For some of the Natural Setting LUD groups (i.e. Remote Recreation) the LUD is a TUS "Avoidance Area" where TUS projects can be located only after analysis of the potential TUS corridors has been completed and no feasible alternatives exist outside the LUD. However, <u>the USFS is not adequately staffed and prepared to complete the TUS Avoidance analysis to determine if other potential corridors are exist, or, to identify other feasible alternatives.</u>
TUS LUD-3	Amend TUS criteria to allow the TUS LUD to <u>apply to all hydropower, geothermal, wind, hydrokinetic, solar, tidal, wave and biomass projects, and other prospective future renewable energy sources</u> that may come forward. Of course these projects need to be as compatible with adjacent lands as is reasonable and feasible but still allow development.  Similar themes are found in SOCs: All ENER 2 SOCs, LUD NEW/ENER-8, MAN 6-E, MAN 7-C, MAN 8-A, SOCIO 2-O, TIM 1-D, TUS LUD-3
TUS LUD-4	Amend TUS criteria to apply to public <u>and private and tribal</u> renewable energy projects. Currently the TUS Overlay only references public hydroelectric power projects (pg. 3-128), which has caused uncertainty and differences with private company proposed projects.
TUS LUD-5	The TUS LUD <u>only focuses on existing</u> roads and transmission corridors. This must be changed to focus on future renewable energy projects.
TUS LUD-6	Amend the TUS LUD to emphasize the development and maintenance of <u>roads and utilities for multiple uses on the TNF rather than limiting the application of the LUD to "major systems."</u>
TUS LUD-7	Better <u>define the process and guidelines for the TUS overlay so it facilitates use of renewable energy;</u> this would be an important step toward utilizing the TNF for the public good.
TUS LUD-8	<u>TUS in the Forest Plan were meant to be general only, so the application of the TUS should be considered approximate.</u> However the TNF and the Federal Energy Regulatory Commission (FERC) are <u>not interpreting it this way</u> and this has eliminated possible environmentally and economically preferable alternatives from consideration.
TUS LUD-9	The current TUS overlay LUD would seem like a means to accommodate such development, but the Forest does not seem capable or willing to utilize that tool.

TUS LUD-10	<p>Geographically specific recommendations for expanding coverage of TUS LUD include:</p> <ul style="list-style-type: none"> <li>• Add a TUS from a point along the Polk Inlet Road system south <u>toward the Niblack and Bokan Mountain area mine prospects.</u></li> <li>• The Forest Plan’s TUS LUD should recognize Canada's navigational rights on the Stikine River and <u>reference the process by which Canada may request surface access through the Stikine River region in the Wilderness LUD,</u> pursuant to Section 1113 of ANILCA and the Stikine River Region Access Study (1987).</li> <li>• During feasibility work on the City and Borough of Sitka (CBS) Takatz Lake Hydroelectric Project, they were <u>unable to consider alternative corridors across Baranof Island that may have been more economically viable and better suited for the landscape because the TUS isn’t in the exact right spot in the Forest Plan.</u> The alternative corridor would pass through a Remote Recreation LUD which doesn’t allow electric transmission lines unless there is a TUS overlay.</li> </ul>
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## 4.69 LUD – MINERALS OVERLAY (LUD-MIN)

Comments about any issue related to the Mineral Overlay LUD.

### 4.69.1 Comment Analysis

A total of ten comments were submitted for this topic. This included comments from representatives of the following entities: the Central Council Tlingit and Haida Indian Tribes of Alaska, the Juneau Chamber of Commerce, the Prince of Wales Community Advisory Council, and the Southeast Alaska Conservation Council. Comments also came from former Governor and former Senator Frank Murkowski, the State of Alaska, the City of Craig, and were expressed by an unaffiliated individual. No comments on this topic came from a form letter.

Four comments were about LUD-MIN 1, noting that a Mineral and Strategic Mineral Land Use Designation (LUD) should be added to the 2008 Forest Plan. Three comments fell under LUD-MIN 4, raising concerns about the 1872 Mining Act’s guaranteed access to minerals on the Tongass. The other two SOCs received one or two comments each.

### 4.69.2 Statements of Concern

LUD-MIN 1	<p><u>A Mineral and Strategic Mineral Land Use Designation (LUD) should be added to the 2008 Forest Plan to promote and support mineral and strategic mineral development and related access roads consistent with National Security and National Strategic Mineral Policies.</u> The Mineral and Strategic Mineral LUD would take precedence over any underlying LUD (subject to applicable laws) regardless of whether the underlying LUD is an “Avoidance LUD” or not. As such, it would represent a “window” through the underlying LUD through which minerals and strategic minerals could be accessed and developed.</p>
LUD-MIN 2	<p><u>The Minerals Overlay LUD applied to the Niblack, Bokan Mountain, and Cholmondeley Sound areas benefits the mining sector and should be retained in TLMP.</u></p>
LUD-MIN 3	<p><u>The State supports the current locations of the Minerals LUD Overlay in the Forest Plan.</u></p> <ul style="list-style-type: none"> <li>• <u>However, the analysis used in the FEIS to describe the relative degree to which LUDs and their associated prescriptions could economically constrain proposed mineral activities (FEIS, page 3-360) is no longer valid due to reapplication of the Roadless Rule on the TNF (also see recommendations in Forest Plan Adjustments section above).</u></li> <li>• <u>The State recommends that the qualifying terms "highest" and "high-valued" be removed from the Goals of the Minerals LUD (Forest Plan,</u></li> </ul>

	<p>page 3-122).</p> <ul style="list-style-type: none"> <li>• Additionally, the <u>term "restoration" in the last paragraph of the Objectives should be replaced with "reclamation."</u></li> </ul>
LUD-MIN 4	<p><u>The 1872 Mining Act's guaranteed access to (virtually) free minerals on the Tongass raises several concerns.</u></p> <ul style="list-style-type: none"> <li>• This law gives miners preference when it comes to using federal lands. Therefore, <u>the Minerals LUD is completely unnecessary and impermissibly elevates mineral development over all other forest uses in violation of NFMA.</u></li> <li>• The Forest Service <u>needs to readopt the 1997 management prescriptions for Mineral and Geology Administration</u> for most of the LUDs, which were substantially modified in 2008. The 1997 Forest Plan stated that the Forest Service would "[e]ncourage the use of state-of-the-art techniques to develop mineral resources, while reducing impacts to other resources to the extent feasible." Deletion of this prescription is inconsistent with the Objectives and Desired Future Condition for all the natural LUDs and with Congressional direction in Section 505(a) of ANILCA. The Forest Plan Amendment should reinsert the 1997 prescription and modify it by adding the term "maximum," so the clause would read: "while reducing impacts to other resources to the maximum extent feasible."</li> <li>• Consider withdrawing both the Yakutat Forelands and Duke Island from mineral development to protect these area's unique cultural, geological, zoological, recreational and scenic special features.</li> </ul>

## 4.70 PROPOSED NEW LUD – COMMUNITY ECONOMIC DEVELOPMENT (LUD-NEW/ COMMUNITIES)

Comments requesting or related to a NEW Community Economic Development LUD or Sustainable Community LUD.

### 4.70.1 Comment Analysis

A total of 22 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power Company, Alaska Miners Association, Alaska Native Brotherhood Camp 70, Alaska Power & Telephone, Central Council Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, Juneau Chamber of Commerce, Kootznoowoo, Inc., Law Office of James F. Clark, Prince of Wales Community Advisory Council, Prince of Wales Island Chamber of Commerce, and the Resource Development Council.

Comments also came from US Senator Lisa Murkowski, Alaska Senator Bert Stedman, Alaska Representative Cathy Munoz, former Governor and former Senator Frank Murkowski, the City of Craig, the City and Borough of Juneau, and the City of Ketchikan. No comments on this topic came from a form letter.

All 22 comments addressed the need to amend the Forest Plan to include a new “Tongass Community Economic Development Zone LUD.”

### 4.70.2 Statements of Concern

LUD-New/ Communities – 1	The 2008 Amended Forest Plan should <u>include a new LUD called the “Tongass Community Economic Development Zone LUD” to promote and support economic development and activities on the TNF for any community that has lower than average State per capita income or pays higher than the national average for electricity/heating.</u> This would help assure that the plan's administration and practices promote economic well-being and social justice in all communities within the Tongass National Forest. Given that many smaller villages in Southeast, those powered by diesel-fired electrical generation, are paying more than 60 cents per kilowatt hour - eight times the regional/national average - it only makes sense for the Forest Service to permit some lands to be open to economic development on an expedited basis.
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## 4.71 PROPOSED NEW LUD – RENEWABLE ENERGY DEVELOPMENT (LUD-NEW/ENERGY)

Comments requesting or related to a NEW Renewable Energy Development LUD .

### 4.71.1 Comment Analysis

A total of 104 comments were submitted for this Topic of Concern. This included comments from representatives of the following entities: Alaska Independent Power Producers Association, Alaska Electric Light and Power Company, Alaska Miners Association, Alaska Native Brotherhood Camp 70, Alaska Power and Telephone (several offices), Central Council Tlingit and Haida Indian Tribes of Alaska, First Things First Alaska Foundation, Juneau Chamber of Commerce, Ketchikan Chamber of Commerce, Kootznoowoo, Law Office of James F. Clark, Organization Inc., Prince of Wales Community Advisory Council, Prince of Wales Island Chamber of Commerce, Resource Development Council, Southeast Alaska Power Agency, Southeast Conference, and Southeast Stevedoring

Comments also came from US Senator Lisa Murkowski, Alaska Senator Bert Stedman, Alaska Representative Cathy Munoz, Alaska Representative Peggy Wilson, former Governor and former Senator Frank Murkowski, the State of Alaska, City of Craig, City and Borough of Juneau, Ketchikan Gateway Borough, City of Ketchikan, City and Borough of Sitka, the Municipality of Skagway, State of Alaska, and by an unaffiliated individual. No comments on this topic came from a form letter.

All 104 comments addressed the need to develop a new Renewable Energy LUD.

A quarter of the comments explain that a new Renewable Energy LUD should take precedence over other underlying LUDs (LUD –NEW/ ENER-4). An additional 15 comments each were either LUD NEW/ ENER-2, which provided the Forest Service with a new proposed Renewable Energy LUD document, or, LUD-NEW/ ENER-1, asking the Forest Service to incorporate the new Renewable Energy Land Use Designation (LUD) with a management prescription into the Forest Plan. The other nine SOCs had from one to ten comments each.

### 4.71.2 Statements of Concern

LUD-NEW/ ENER-1	<u>Incorporate a Renewable Energy Land Use Designation (LUD) with a management prescription, into the Forest Plan to encourage identification, evaluation, responsible development, and sustainable operation of existing and new renewable energy projects and facilities on the TNF, including those for emerging sources such as wind, tidal, and geothermal.</u> (Some suggest slightly different names, adding “development” or “resource” into LUD title, others suggest it should be an Overlay LUD – all agree on the goal, as stated above.
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	<ul style="list-style-type: none"> <li>• Facilities are any facility or corridor needed to access, develop, construct, and monitor Renewable Energy Resource projects, including roads, transmission corridors, associated clearing needs for line maintenance, communication equipment (including radio, microwave, fiber optic cables, and high-speed broadband), and all related access needs.</li> <li>• This will provide needed guidelines for active management of renewable resources within the Tongass National Forest.</li> <li>• The Tongass has hundreds of renewable energy opportunities as well as federal power site classifications. An existing database of potential sites maintained by AEA and can be found at <a href="http://www.akenergyinventory.org/downloads/HYD2011-2/HYD2011-2.kmz">http://www.akenergyinventory.org/downloads/HYD2011-2/HYD2011-2.kmz</a></li> </ul> <p>Similar themes are found in SOCs: ENER 1-B&amp;C, ENER 1-N, ENER 1-O, ENER 3-C, ENER 3-G, ENER 3-Q, LUD-NEW/ENER-1, TUS-LUD (all), MAN 7-M, RR-3, TRANS 3-C, TRANS 4-F</p>
LUD NEW/ ENER-2	<u>A 4-page proposed Renewable Energy LUD and Management Prescription offers a Goal, Objectives and Desired Future Statement.</u> See page 4-207.
LUD NEW/ ENER-3	<u>The 2008 Forest Plan failed to include a Renewable Energy Resource Plan and Renewable Energy LUD; now is the time to correct this omission.</u> This will help remedy the Forest Plan, the IRA, and Executive Order 12866 review's failure to properly analyze the value of renewable energy in Southeast Alaska to its 32 communities or consider the economic benefit or job opportunities related to development of renewable energy.
LUD NEW/ ENER-4	<u>The Renewable Energy LUD should take precedence over any underlying LUD (subject to applicable laws) regardless of whether the underlying LUD is an "Avoidance LUD" or not. As such, it would represent a "window" through the underlying LUD through which renewable resources could be accessed and developed.</u> This would address the problem that arose and 4-year old commitment to resolve it regarding a hydropower project in a Remote Recreation LUD -TUS Avoidance Area.
LUD NEW/ ENER-5	<u>Allow hydropower development in all LUDs other than Wilderness, Monuments, and Congressionally designated areas such as CSUs and Legislatively-designated LUD IIs.</u> Projects would still need to undergo a thorough NEPA analysis, so there would be no loss of environmental protection.
LUD NEW/ ENER-6	<u>A Renewable Energy LUD is needed to combat high energy costs in rural Southeast Alaska.</u> With the increasing prices of diesel, renewable energy projects present an opportunity to provide lower cost energy to support the

	<p>communities, industries, and economy in Southeast Alaska. Moving rural communities off expensive fossil fuels to cheaper renewable energy is the basic foundation for a successful TNF transition. The health, vitality, strength, and future of our region relies upon reasonable cost, environmentally sound, renewable energy.</p> <ul style="list-style-type: none"> <li>Renewable energy [enabled by a Renewable Energy LUD] would help improve the economic competitiveness of rural Southeast communities. It would allow communities and development projects in Southeast Alaska to significantly decrease the greenhouse gas (GHG) and other emissions in the TNF, reduce the need for shipment and potential spills of diesel and operate these development projects and communities' economies and at a lower cost than diesel. Moreover, it would avoid the need for some expensive air control devices.</li> </ul>
<p>LUD NEW/ ENER-7</p>	<p><u>Mining throughout Southeast Alaska would be greatly advantaged by the availability of renewable energy [enabled by a Renewable Energy LUD] to offset the cost of diesel in operating mine in rural Southeast Alaska.</u> Hydropower can significantly reduce the operating costs of a mine.</p> <ul style="list-style-type: none"> <li>For example, the Greens Creek Mine is greatly advantaged by the availability of hydropower from AEL&amp;P. The Kensington Mine would benefit if low cost, renewable energy were available to it. The projects being developed on Prince of Wales Island (Niblack and Bokan Mountain) are good examples of mines that could benefit from renewable energy.</li> </ul> <p>Similar themes are found in SOCs: ENER 1-G, ENER 2-A&amp;B, ENER 3-N ENER 3-S, ENER 3-W, LUD NEW/ENER-7, SOCIO 1-D&amp;E, SOCIO 2-A, SOCIO 2-P, SUB 3-C</p>
<p>LUD NEW/ ENER-8</p>	<p><u>A Renewable Energy LUD could support timber industry efforts to enter into biomass fuel markets</u> as a component of the process of logging and milling Tongass wood. A LUD supportive of renewable energy also recognizes the efforts of communities and school districts on Prince of Wales Island to use wood as a fuel source to heat</p> <ul style="list-style-type: none"> <li>For example, the City of Craig and Craig City School District share the use of a wood fired boiler that heats two school buildings including the Craig Aquatic Center; Southeast Island School District burns cord wood to heat the Thorne Bay and Coffman Cove school buildings; both Ketchikan and Sitka have wood-fired boiler systems that provide heat to public buildings; and at least one commercial building in Juneau derives its heat from wood fuel.</li> </ul> <p>Similar themes are found in SOCs: All ENER 2 SOCs, LUD NEW/ENER-8, MAN 6-E, MAN 7-C, MAN 8-A, SOCIO 2-O, TIM 1-D, TUS LUD-3</p>

LUD NEW/ ENER-9	<p>A Renewable Energy LUD would promote development of renewable resources in the Tongass and <u>help the US realize its goals of increasing domestic energy production through renewable sources, and reducing emissions and greenhouse gasses.</u> It would be consistent with Obama Administration energy security and environmental policy.</p> <ul style="list-style-type: none"> <li>Specifically, it would help implement EO 13514; EO 13423 (which requires federal agencies to reduce energy intensity by 3% each year with the goal of 30% reduction by FY 2015); the Obama Administration’s March 2011 Blueprint for a Secure Energy Future; the March 2012 the White House Progress Report on goals set out in the Blueprint, and EISA.</li> </ul>
LUD NEW/ ENER-10	<p>The Tongass National Forest is host to a large number of proven hydroelectric, wind, tidal, and geothermal resources. <u>A Renewable Energy LUD will help assure these resources can be developed in a manner that can help provide renewable energy to Alaskans, as well as to other parts of the US through transmission connections through Canada.</u> One promising opportunities lie in developing hydroelectric power and building transmission lines to connect Southeast Alaska's communities to each other and to Canada's grid, generating electric power for potential export. Such projects would create new jobs through constructing, operating and maintaining hydroelectric and transmission facilities. Previous work by the Forest Service estimated job creation by this type of work at 10 jobs for every million dollars invested.</p>
LUD NEW/ ENER-11	<p>A new Renewable Energy LUD should <u>specify/include techniques that would reduce the time to takes to permit renewable energy projects.</u> This would be in keeping with policies set out in EO 13580 (July 2011), EO 13604 (March 2012), and the May 2013 Presidential Memorandum to the Executive Departments and Agencies entitled: Modernizing Federal Infrastructure Review and Permitting Regulations, Policies and Procedures.</p>
LUD NEW/ ENER-12	<p><u>Create a new Renewable Energy LUD covering or revise regulations to govern the existing rule to provide firm opportunities for road and power line access to renewable energy sites.</u> This will help implement the PL 106-511 that authorized federal funding for the then proposed <u>Southeast Alaska Electrical Intertie System</u>, which would allow access routes for construction and maintenance roads and for transmission power lines to connect renewable energy projects to load centers.</p>

## RENEWABLE ENERGY RESOURCE LAND USE DESIGNATION

### GOAL

To encourage, facilitate, and expedite the exploration, permitting, development, construction and operation of Renewable Energy Resources in areas of the Tongass National Forest having potential for renewable energy development, including those identified by agencies of the United States including the Forest Service, the State of Alaska, the Alaska Energy Authority (AEA), and private developers. An existing data base is currently in place and maintained by AEA and can be found by using the following link:

<http://www.akenergyinventory.org/downloads/HYD2011-2/HYD2011-2.kmz>

### OBJECTIVE

Apply this management prescription to those public and private project areas having an approved Federal Energy Regulatory Commission (FERC) preliminary permit or other authorization for non-hydropower type renewable energy projects. Apply this management prescription to project areas having a geothermal lease or lease application with the Bureau of Land Management (BLM). Apply this management prescription to those projects for which application is made for a Special Use Permit to develop a Renewable Energy Resource project.

Use this prescription as criteria in the planning, design, permitting, and development of renewable energy resource projects and plans of operations.

During the period before actual construction of a new Renewable Energy Resource project, the management prescription(s) of the (initial) LUD(s) underlying the project area will remain applicable, but will not interfere with or impede the exploration, feasibility reviews, permitting and development of the Renewable Energy Resource. Upon initiation of construction, and during project operation this Renewable Energy Resource management prescription will apply. The Renewable Energy Resource LUD takes precedence over any underlying LUD (subject to applicable law) regardless of whether the underlying LUD is an Avoidance LUD or not. As such it represents a "window" through the underlying LUD through which renewable energy projects can be built along with road and infrastructure access to such projects.

For application of this LUD Renewable Energy Resources are defined as public and private hydropower, geothermal, wind, hydrokinetic, solar, tidal, wave and biomass.

Construction of a Renewable Energy Resource project requires a Special Use permit, which, in turn, requires a project level NEPA analysis and decision-making. Renewable Energy Resource projects may be located in an Avoidance LUD whether or not feasible alternatives exist outside the Avoidance LUD. As required by the Council of Environmental Quality regulations, only "reasonable alternatives" to the proposed Renewable Energy Resource project need be considered.

Allow special uses and facilities associated with Renewable Energy Resource development. For application of this LUD "associated facility" is defined as any facility or corridor needed to access, develop, construct, and monitor Renewable Energy Resource projects. Examples of such associated facilities include roads, low voltage electrical, high voltage electrical systems, pipelines of any diameter, communication equipment (including radio, microwave, fiber optic cables, and high-speed broadband)

Allow special uses and facilities associated with Renewable Energy Resource development even if a portion of the project is based in waters adjacent to TNF land, such as ocean energy, tidal, and wave.

Allow special uses and facilities not related to Renewable Energy Resource development if compatible with present or future Renewable Energy Resource development.

If the development of Renewable Energy Resources changes the Recreation Opportunity System (ROS) setting, manage recreation and tourism in accordance with the new setting. Consider the development of recreation and tourism facilities in conjunction with the planning of state or federal highways, and Renewable Energy Resource projects.

Following construction of Renewable Energy Resource projects, lands that are permanently cleared for such projects will be considered unsuitable for timber production.

Renewable Energy Resource projects may dominate the seen foreground area yet are designed with consideration for the existing form, line, color, and texture of the characteristic landscape.

Minimize and/or mitigate adverse effects to wildlife habitat and populations to the extent feasible.

Maintain the present and continued productivity of anadromous fish and fish habitat to the extent feasible.

## **DESIRED CONDITION**

Renewable Energy Resource projects have been constructed in an efficient, economic, and orderly manner, and have been designed to be compatible with the adjacent LUD to the maximum extent feasible. The minimum land area consistent with an efficient, safe, economic, and maintainable Renewable Energy Resource project has been used for their development. Effects on other resources have been recognized and resource protection has been provided. Other resource uses and activities do not conflict with Renewable Energy Resource project operations.

## 4.72 PROPOSED NEW LUD – TREE FARM (LUD-NEW/TREE)

Comments requesting or related to a new Tree Farm LUD.

### 4.72.1 Comment Analysis

A total of four comments were submitted for this topic. This included comments Woodbury Enterprise and an unaffiliated individual. No comments on this topic came from a form letter.

Three of the four comments came from an individual who asked the Forest Service to adopt a proposed Tree Farm LUD to promote the farming of trees on selected lands to maximize timber production. The other SOC had one comment.

### 4.72.2 Statements of Concern

LUD –NEW/ TREE 1	Transition is needed from old growth logging to more sustainable logging practices.
LUD-NEW/ TREE 2	Create a Tree Farm LUD to promote the farming of trees on selected lands to maximize timber production.
	<u>A 4-page proposed Tree Farm LUD and Management Prescription offers a Goal, Objectives, Desired Future Statement, and applicable Standards and Guidelines</u> and can be read following the LUD New/Trees SOCs on page 4-207.

## **PROPOSED TREE FARM LAND USE DESIGNATION (LUD)**

### **Goals**

To maintain and promote timber production from selected lands dedicated to farming timber to maximize saw log production.

These lands will be selected to provide a reliable economic timber supply to support a viable integrated forest products industry.

### **Objectives**

Locate and design harvest activities to meet timber production objectives.

Suitable forestlands are available for tree farming.

There is adequate land under restrictive use to allow for dedicating lands for the purpose of tree farming.

Clearcutting is the appropriate silvicultural system for this LUD; clearcutting will result in maximizing regeneration and sustainability.

Improve timber growth and productivity on commercial forestlands.

Plan, inventory, prepare, offer, sell and administer timber sales and permits to ensure the orderly development of timber production.

Emphasize the overall reduction of costs, and increase of revenues within the timber program.

Plan a transportation network of roads and helicopter access that will eventually access the suitable forestlands for standard logging and helicopter yarding systems for initial entry and future second growth harvest.

### **Desired Conditions**

Suitable forest lands are managed for the production of saw timber and other wood products on an even-flow, long-term sustained yield basis; the timber yield produced contributes to Allowable Sale Quantity and provides timber to support a viable integrated forest products industry. An extensive road system provides access for timber management activities, recreation uses, hunting and fishing, and other public and administrative uses; some roads may be closed, either seasonally or yearlong, to address resource concerns. Timber Management activities will dominate the areas. Tree stands are healthy and with a mix of age classes from

young stands to trees of harvestable age. Recreation opportunities, associated with roaded settings are available.

**Apply the following LUD and Standards and Guidelines:**

**Facilities Improvements: FAC2 and FAC3**

A. Permanent administrative facilities are constructed to be compatible with this LUD objective.

**Fire Suppression: FIRE1**

*Suppression Action*

A. Suppress wildfires using the suppression option identified in the Southeast Alaska/Prince William Sound Fire Management Plan. B. Suppression tactics are limited only by the standards and guidelines for the LUD (e.g., soil and water).

**Fuel Improvements: FIRE2**

*Prescribed Fire*

A. Management-ignited prescribed fire may be used for fuels management, and disease protection, silvicultural site preparation, and wildlife habitat improvement.  
B. Do not use prescribed natural fire.

**Forest Health Management: HEALTH1**

A. Forest insect and disease management activities emphasize forest health through manipulating insects and diseases to desirable levels.

1. Encourage Timber Stand Improvement, sanitation, and salvage.
2. Evaluate chemical, cultural, mechanical, biological, and "no action" to manipulate insects and diseases to desirable levels.

**Forest Insect and Disease Survey and Inventory: HEALTH2**

A. Survey and inventory visible outbreaks.

**Heritage Resource Activities: HSS1**

*Inventory*

A. Provide heritage resource assistance to all development proposals. Coordination includes participation and support for environmental analysis, inventory, evaluation, assessment, monitoring, and protection of heritage resources during activities.

1. Heritage resource inventory will be accomplished during project planning. State Historic Preservation Office concurrence and Forest Supervisor approval is required prior to implementation.
2. Heritage resource specialists shall provide input on known or predicted heritage resource site density in proposed project areas and make recommendations to manage heritage resources.
3. Should any heritage resources be discovered during project activity, all work within the vicinity of the discovery shall cease until a heritage resource specialist is able to evaluate the situation and the Forest Supervisor approves resumption of activity.

**LANDS Special Use Administration (Non- Recreation): LAND2**

A. Authorize only those uses that are compatible with LUD objectives. Avoid issuing, or limit the duration of, permits for uses that require natural surroundings.

B. This LUD represents a Transportation and Utility Systems (TUS) "window," and provides opportunities for the future designation and location of transportation and utility sites or corridors.

**Landline Location and Maintenance: LAND4**

A. Provide adequate landline marking for Forest Service contractors.

1. Prior to Forest Service management activities, survey, mark, and post the boundary of National Forest System lands, to Forest Service Standards, where there is a risk of trespass.

**Minerals and Geology Resource Preparation: MG1***Resource Preparation*

A. Coordinate the location of timber and mining transportation systems when feasible.

B. Coordinate with claimant to ensure the location of timber sale units and roads across mining claims do not interfere with mining activities, markers, and improvements.

**Minerals and Geology Administration: MG2***Forest Lands Open to Mineral Entry*

A. Forest lands within this LUD are open to mineral entry.

B. Assure prospectors and claimants their right of ingress and egress granted under the General Mining Law of 1872, Alaska National Interest Lands Conservation Act of 1980 (ANILCA), and National Forest Mining Regulations 36 CFR 228.

C. Permit reasonable access to mining claims, leases, and material sites and authorization of orderly mineral resource development with the provisions of an approved Plan of Operations in accordance with National Forest Mining Regulations 36 CFR 228 and FSM 2800.

**Watershed Resource Planning: SW3**

A. Delineate the location of high hazard soils, riparian, and other sensitive areas on project maps to ensure their recognition, proper consideration, and protection on the sale area.

B. Manage state classified public water supply source watersheds for multiple uses, while providing water suitable for human consumption in compliance with the Safe Drinking Water Act, State of Alaska Drinking Water Regulations and Water Quality Standards.

**Timber Resource Planning: TIM4**

A. Timber management is emphasized. Suitable forested land is available for harvest and is included in the Allowable Sale Quantity calculation for the support of a viable integrated Timber Industry.

**Timber Sale Preparation: TIM5**

A. Locate and design timber harvest activities primarily to meet timber objectives. Include integration of other resources objectives, particularly wildlife and vegetative diversity, if they do not have a significant adverse impact on the timber resource goals. Timber harvest activities may include all applicable silvicultural systems as long as the tree farm objective is met.

B. Clearcut is the silvicultural method for this LUD. C. Seek to provide for a reasonable assurance of windfirm boundaries. To design for windfirmness, consider conditions such as soils, local wind patterns, tree height and size, and other site-specific factors. **Timber Resource**

**Coordination: TIM7**

A. Personal use sawtimber and firewood harvesting and Christmas tree cutting activities are fully compatible with this LUD.

B. Administrative use of timber is fully compatible with this LUD.

**Transportation Operations: TRAN**

A. Develop and manage cost-effective LUD direction.

1. Perform integrated logging system and transportation system analysis to determine the least-cost facility (considering cost of construction, maintenance, and hauling) and design standards necessary to meet LUD objectives.

2. If the need to restrict access is identified during project interdisciplinary review, roads may be closed, either seasonally or yearlong.

## 4.73 PROPOSED NEW LUD – OTHER (LUD-NEW/OTHER)

Comments requesting or related to a NEW LUD (other than Energy, Trees or Community) and other general comments requesting changes to LUDs.

### 4.73.1 Comment Analysis

A total of 19 comments were submitted for this topic. This included comments from representatives of the following entities: Alaska Miners Association, Alaska Native Brotherhood Camp 70, Blue Starr Oyster Co., Kootznoowoo, Law Office of James F. Clark, Pearl of Alaska, Prince of Wales Community Advisory Council, Resource Development Council, Sierra Club, Trout Unlimited and Un-Cruise Adventures.

Comments also came from US Senator Lisa Murkowski, Alaska Senator Bert Stedman, and the City and Borough of Wrangell; and were expressed by comments at the Petersburg public meeting and from unaffiliated individuals. No comments on this topic came from a form letter.

One-third of all comments for this TOC ask the Forest Service to create a Mineral and Strategic Mineral LUD to support mineral development and related access roads (LUD-NEW/ OTHER 1). Fours comments state that reasonable access needs to be provided to land to allow for development in the Tongass (LUD-MIN 4). The other six SOCs received one to two comments each.

### 4.73.2 Statements of Concern

LUD-NEW/ OTHER 1	<u>Create a Mineral and Strategic Mineral Land Use Designation (LUD) to support mineral development and related access roads consistent with the National Security and National Strategic Mineral Policies.</u> This overlay LUD would take precedence over any underlying LUD.
LUD-NEW/ OTHER 2	Create a new LUD for Mariculture.  Similar themes are found in SOCs: FISH 1-A&B, FISH 2-A&B, FISH 3-A&B, LUD-NEW/Other 2, MAN 2-U, MAN 3-J, MAN 4-G, MAN 5-A, MAN 5-H, MAN 7-Q, MAN 8-J, SOC 2-K
LUD-NEW/ OTHER 3	<u>Natural Setting LUDs should take priority over Development LUDs throughout the Tongass.</u> All areas encompassed by the Roadless Rule should be classified as Natural Setting LUDs. Maintaining wildlife habitat and fish stream habitat is important for sport and commercial reasons. Special areas of interest include: <ul style="list-style-type: none"> <li>• Peril Strait areas Ushk Bay, Rodman Bay, Saook Bay, Deep Bay, Fish Bay</li> <li>• Cleveland Peninsula</li> <li>• North Kuiu – Saginaw Bay, Security Bay</li> </ul>

	<ul style="list-style-type: none"> <li>• Lake Eva, Kelp Bay</li> <li>• Sitkoh Bay, Sitkoh Lake</li> <li>• Port Houghton, Windham Bay</li> </ul>
LUD-NEW/ OTHER 4	<p><u>Development LUDs should take precedence over Non-development LUDs.</u> Reasonable access needs to be provided to land to allow for development and the harvest of timber.</p> <p>Similar themes are found in SOCs: LUD II-1, LUD-NEW/Other 4, MAN 8-G, MINE 1, MINE 2, RR-1, R-19, SOC 2-F, TRANS 4-A</p>
LUD-NEW/ OTHER 5	<p>If the conservation strategy is revised <u>adjust the LUDS of inventoried roadless areas to bring them into compliance with the Roadless Rule and remove important watersheds from the suitable timber base.</u></p>
LUD-NEW/ OTHER 6	<p>The LUD that “contains” Irish Creek, Keku Lakes and Creek, Kushneahin Lakes and Creek, Lovelace, Totem Bay watershed, Tunehean Creek, Port Houghton, and Petersburg Creek need changed to either a new LUD, or the existing LUD should be revised, to emphasize long term salmon productivity and community use rather than timber harvest.</p>

# WILDERNESS and NATIONAL MONUMENT WILDERNESS

## Goals

Manage all designated Wilderness to maintain the enduring resource of Wilderness as directed by the Wilderness Act of 1964, subject to the special provisions and exceptions in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) and the Tongass Timber Reform Act of 1990 (TTRA).

Protect and perpetuate natural biophysical and ecological conditions and processes. Ensure Wilderness ecosystems are substantially free from the effects of civilization.

Provide a high degree of remoteness from the sights and sounds of humans, and opportunities for solitude or primitive recreation activities consistent with Wilderness preservation.

Keep Wilderness untrammeled and free from human control or manipulation, including actions taken to manage Wilderness.

Protect the undeveloped character of Wilderness by following legislative guidelines regarding permanent improvements or human occupation, including mechanized transport and motorized equipment.

## ~~Goals Specific to National Monument Wilderness~~ (Rescinded, ANILCA Section 1322)

~~To manage the Wilderness portions of Admiralty Island and Misty Fjords National Monuments to maintain an enduring Wilderness resource, while providing for public access and uses consistent with the Wilderness Act of 1964, ANILCA, and their respective Presidential Proclamations of 1978, which designated these units as National Monuments because of their superlative combination of significant scientific and historical features.~~

~~Admiralty Island, exclusive of the Mansfield Peninsula, was designated as a National Monument for the scientific purpose of preserving intact a unique coastal island ecosystem. The goal of preservation was to ensure continued opportunities for study of Admiralty Island's ecology and its notable cultural, historical, and wildlife resources, within its relatively unspoiled natural ecosystem. Protection and study of Tlingit cultural resources, other historical resources, and brown bear and bald eagle populations are specifically directed.~~

~~Misty Fjords was designated as a National Monument to serve the scientific purposes of preserving a unique ecosystem and the remarkable geologic and biological objects and features it contains. The goal of preservation was to ensure continued opportunities for study of Misty Fiord's geology and ecology, including the complete range of coastal to interior climates and ecosystems. Protection and study of the geology, plant and animal succession, historical resources, and fish and wildlife resources are specifically directed.~~

## Objectives

Apply a multi-disciplinary focus to Wilderness management; consider stewardship of Wilderness in the annual program of work by all resources.

Manage recreation activities so that the levels of social encounters, on-site developments, methods of access, and visitor impacts indicated for the Primitive Recreation Opportunity Spectrum (ROS) Class are emphasized (see Chapter 4, Recreation and Tourism and Appendix I). Areas managed as Semi-Primitive within a Wilderness are an exception and not encouraged.

Provide for public uses of Wilderness as authorized in the Wilderness Act, but subject to ANILCA provisions for motorized and non-motorized access and travel, including reasonable traditional

subsistence use by rural residents, and provisions of other applicable Wilderness designation acts.

Maintain trails and primitive facilities that are in harmony with the natural environment and that promote primitive recreation opportunities. Feature facilities designed primarily to provide resource protection and encourage smaller group size, and emphasize challenge and risk instead of convenience. Maintain the Wilderness capacity to provide information on natural ecological processes.

Preserve and perpetuate biodiversity.

Inventory, reduce, and, when possible, eliminate non-native species in Wilderness.

Manage Wilderness as a place where self-reliance and primitive skills are needed and can be honed.

### **Objectives Specific to National Monument Wilderness**

Inventory, research, protect, and interpret National Monument resources as directed by Monument designation consistent with Wilderness management practices.

Make resource and research information about the National Monuments available to other forest units where it may be beneficial for management of multiple use lands.

### **Desired Condition**

All designated Wilderness on the Tongass National Forest is characterized by extensive, unmodified natural environments. Ecological processes and natural conditions are not measurably affected by past or current human uses or activities. Users have the opportunity to experience independence, closeness to nature, solitude and remoteness, and may pursue activities requiring self-reliance, challenge, and risk. Motorized and mechanized use is limited to the minimum needed for the administration of the Wilderness. Allow for access to state and private lands, subsistence uses, and public access and other uses to the extent provided for by ANILCA.

### **Desired Condition Specific to National Monument Wilderness (Rescinded ANILCA Section 1322)**

~~The purposes of National Monument designation are fulfilled by protecting and learning more about the special resources they contain. Appropriate research is encouraged and supported within the constraints of Wilderness designation, and contributes to both the purposes of the Wilderness National Monuments and improved management of other forest lands. Appropriate interpretive and educational efforts allow the public to better understand the resources of these special areas and to appreciate how these areas fit into the local, regional, and even global context of geology, ecology, and human history. The Wilderness portions of Admiralty Island and Misty Fjords National Monuments are characterized by extensive, unmodified natural environments. Ecological processes and natural conditions are not measurably affected by past or current human uses or activities. Users have the opportunity to experience independence, closeness to nature, solitude and remoteness, and may pursue activities requiring self-reliance, challenge, and risk. Motorized and mechanized use is limited to the minimum needed for the administration of Wilderness. Allow for access to state and private lands, subsistence uses, and public access and other uses to the extent provided by ANILCA. If not specifically provided through an ANILCA exception, the resources within a designated Wilderness shall be administered in accordance with the applicable provisions of the Wilderness Act.~~

**Wilderness and National Monument Wilderness Land Use Designations**  
**Apply the following Forest-wide Standards and Guidelines located in Chapter 4:**

<b>Category</b>	<b>Section</b>	<b>Subsections</b>
<b>Air</b>	AIR	All
<b>Beach and Estuary Fringe</b>	BEACH1	All
	BEACH2	I
	FAC	All
<b>Facilities</b>	FAC	All
<b>Fire</b>	FIRE1	All
<b>Fish</b>	FISH	All
<b>Forest Health</b>	HEALTH1	I(B:1;C)
<b>Heritage Resources/Sacred Sites</b>	HSS	All
<b>Invasive Species</b>	INV	All
<b>Karst and Cave Resources Lands</b>	KC	All
	LAND1, 3, 4, 6	All
	LAND2	I(A:1-13),VII,IX
<b>Minerals and Geology</b>	LAND5	I(A)
	MG1	All
	MG2	I,III,IV,VI,VII
<b>Plants</b>	PLA	All
<b>Recreation and Tourism</b>	REC1	All
	REC2	I,II(A),III
	REC3	I,II,III(B),IV-VII
	RIP1	All
<b>Riparian</b>	RIP2	I,II(A-E)
	RUR	All
	SCENE1	All
<b>Rural Community Assistance Scenery</b>	SCENE2	I,II(A,E)
	SCENE3	I(B,D),II
	SW1, 2, 4	All
<b>Soil and Water</b>	SW3	I(A:1-4,B-F),II
	SUB	All
<b>Subsistence</b>	SUB	All
<b>Timber</b>	TIM2,5 (TIM5 not appropriate, delete)	All
<b>Trails</b>	TRAI1	I(A-E;F:1,3,5,6)
	TRAI2	All
<b>Wetlands</b>	WET	All
<b>Wildlife</b>	WILD1	I-V; VI(A,B,C,E); VII; VIII; IX(A:1-3,5- 8,11,B); X; XI(A:1); XII-XIV; XVI(A:1)
	WILD2	I(A:1,B)
	WILD4	All

## Apply the following LUD Standards and Guidelines:

### AIR Air Resource Inventory: AIR1

- A. Air Quality monitoring will be accomplished in accordance with specific District- or Forest-level plans and strategies. (Need to update this to reflect the Wilderness Character Monitoring Plan approved by the Forest Supervisor.)

### FACILITIES Administrative Facilities: FAC1, FAC2, FAC3, and FAC4

- A. Construct no new permanent administrative facilities in Wilderness, except as consistent with ANILCA, Sections 1303, 1306, 1310, and 1315, and other applicable Wilderness designation acts.
- B. Allow the continued operation and maintenance of permanent administrative facilities for which there is an ongoing need (ANILCA, Section 1306 (b)).
  - 1. When reconstruction of existing permanent administrative structures is necessary, reconstruct or replace them with structures of compatible design.
  - 2. During reconstruction and maintenance activities:
    - a. Paint or stain structure to blend with the environment;
    - b. Keep clearing of vegetation to the minimum feasible; and
    - c. Select materials that are natural in appearance.
- C. Allow temporary facilities and crew barges for administration.
  - 1. Temporary administrative camps used by Wilderness rangers, trail crews, or for other administrative activities should avoid areas used for camping by the general public and should be screened from view.
  - 2. Temporary administrative camps may remain in place only during periods required for the administrative activity. All equipment and materials will be removed or collapsed and laid flat at the end of the field season or during other extended periods of non-use.
  - 3. Temporary camps will seek to achieve minimum impact on the land. There will be no permanent foundations or anchors, and only minimal clearing of vegetation at campsites.
  - 4. Crew barges should be located in unobtrusive locations. They may be periodically moved and relocated to support administrative needs.
- D. Allow administrative use of public cabins and shelters in Wilderness. When scheduling, avoid conflict with public use.
- E. When necessary, allow radio repeaters to provide essential communications for the health and safety of employees involved in the administration of the area. Allow permanent radio repeaters currently located in Wilderness to remain.

### FIRE - Fire Suppression: FIRE1

#### Suppression Action

- A. ~~Suppress wildfires using the suppression option identified~~ Determine the appropriate management response to wildfires within a wilderness as directed in the ~~Southeast Alaska/Prince William Sound~~ Tongass National Forest Fire Management Plan.
- B. Objective is to observe fire to its natural role in the wilderness ecosystem to the maximum extent possible, consistent with safety of persons, property, and other resources. Reduce to an acceptable level, the risks and consequences of wildland fire within wilderness, or escaping from wilderness.
- C. Emphasize suppression tactics resulting in the least possible disturbance or evidence of human presence.
  - 1. Use of mechanized equipment requires approval by the Forest Service officer with delegated authority.
  - 2. Suppression tactics will avoid human/bear conflicts and existing policy will be emphasized to leave no trash or any other kinds of bear attractants in the area.
  - 3. Rehabilitation of all campsites, suppression lines, and other evidence of human presence will occur as soon as it is safe, but within 1 year after the fire occurs.

**Fuel Improvements: FIRE2***Prescribed Fire*

- A. As a general management practice, do not use management-ignited prescribed fire. Should it become necessary to consider the use of management-ignited prescribed fire, Forest Service Manual (FSM) 2324 provides direction.
- B. As a general management practice, allow natural fires in accordance with fire management plans specific to the area. (Consult FSM 5142.)

**FISH Fish Habitat Planning: FISH2***Planning*

- A. Plan for fisheries in Wilderness consistent with ANILCA, Section 1315(b), which recognizes the goal of restoring and maintaining fish production in the State of Alaska to optimum sustained yield levels and in a manner that adequately ensures protection, preservation, enhancement, and rehabilitation of the Wilderness resource. Subject to reasonable regulations, permanent improvements and facilities such as fishways, fish weirs, fish ladders, fish hatcheries, spawning channels, stream clearance, egg planting, and other accepted means of maintaining, enhancing, and rehabilitating fish stocks may be permitted. For this purpose, optimum sustained yield levels will be considered synonymous with the long-term harvest goals documented in the State of Alaska Comprehensive Salmon Plans and other state fisheries plans. (Consult R-10 supplements to FSM 2632 and FSM 2320 for further details.)
- B. Determine the need for Wilderness aquaculture projects (as described in ANILCA, Section 1315(b)) on a broad basis that includes the potential of private, state, and federal nonwilderness projects.
- C. Evaluate fish habitat improvement during project planning by considering:
  - 1. availability of suitable nonwilderness opportunities that should be used first;
  - 2. effects on Wilderness conditions, in general;
  - 3. effects resulting from the introduction of species not indigenous to the watershed;
  - 4. the appropriateness of structures both in type and scale to the desired future condition for the Wilderness and the ROS class setting; and 5) the need to provide well-distributed fisheries that support sport and commercial fisheries, subsistence, and community stability.
- D. In planning, stress protection of fish habitat to prevent the need for mitigation.

**Fish Habitat Improvement: FISH3**

- A. Construct facilities in a rustic manner to blend into the natural character of the area and limit facilities to those essential to the project (ANILCA, 1315(b)). Methods for the installation of any feature or facility will apply the minimum requirement concept to management activities that affect the Wilderness resource and character by conducting a minimum requirements analysis (FSM 2322.03).
- B. Permit reasonable access, including the temporary use of motorized equipment, subject to reasonable regulation to maintain the Wilderness character, water quality, and fish and wildlife values of the area.

**FOREST HEALTH Forest Health Management: HEALTH1**

- A. Allow natural occurrences to play their normal role in ecological succession.

**Forest Insect and Disease Survey and Inventory: HEALTH2**

- A. Survey and inventory visible insect and disease outbreaks.

**HERITAGE Heritage Resource Activities: HSS1***Enhancement*

- A. Heritage resources are available for scientific study to the extent that the study is consistent with
  - 1) the preservation of Wilderness;
  - 2) the intent of the Wilderness Act; and
  - 3) heritage resource management objectives.

B. Heritage resources are available for recreational, scenic, scientific, educational, conservation, and historic uses, consistent with management of Wilderness.

1. Provide interpretive information concerning heritage resources to users in the form of exhibits and publications outside of the Wilderness.

#### *Evaluation*

Develop priorities and schedule management activities to implement heritage resource inventory, evaluation, and protection within the Wilderness.

1. Identify heritage properties to be nominated to the National Register of Historic Places.
2. Identify, classify, and evaluate known heritage resources.
3. Identify heritage properties that require stabilization or other protective measures.

#### **INVASIVE SPECIES Invasive Species Monitoring and Treatment: INV2 and INV3**

- A. Non-native, invasive species monitoring and treatment will be accomplished in accordance with specific District- or Forest-level plans and strategies. *(Inventories and treatments will follow the Wilderness Character Monitoring Plan signed by the Forest Supervisor.)*

#### **KARST AND CAVES Cave Management Program: KC2**

- A. Identify opportunities for interpretation of caves for public education and enjoyment. A cave management plan will be developed prior to the authorization of appropriate, allowed activities inside caves. Activities include agency interpretation, commercial use, or scientific investigation.
- B. Manage caves as Class 1 (Sensitive) or Class 3 (Undeveloped) as described in the Karst and Cave Resources Forest-wide Standards and Guidelines.

#### **LANDS Special Use Administration (non-recreation): LAND2**

- A. Authorize only activities that are consistent with the Wilderness Act or specifically allowed by ANILCA, or other applicable Wilderness designation acts, and are otherwise in compliance with management direction of this plan. (Consult FSM 2700, FSM 2320, and Regional Supplements.)
  1. Analyze proposals on a case-by-case basis.
  2. Permit only activities consistent with the goals, objectives, and desired conditions for Wilderness.
  3. Integrate special use management with the ROS so that approved uses and activities emphasize the most primitive ROS class setting.
  4. Avoid authorizing uses that are not dependent upon Wilderness resources or uses for which reasonable alternative locations exist outside the Wilderness.
  5. Utilize cost-recovery direction to process applications.
- B. New special use cabins and related structures may be permitted by the Forest Service officer with delegated authority in accordance with Section 1303(b)(1) of ANILCA under the conditions described below.
  1. The permit is nontransferable and limited to a 5-year term.
  2. The determination is made that the proposed use, construction, and maintenance of the structure(s) are consistent with the goals, objectives, and desired conditions for Wilderness.
  3. The determination is made that the proposed cabin is either directly related to the administration of the Wilderness or the continuation of an ongoing use otherwise allowed in the Wilderness, where a) the applicant has no reasonable alternative site for constructing a cabin; and b) the cabin is not to be used for private recreational use.
  4. The United States shall retain ownership of the cabin and related structures.
  5. To qualify, an applicant must:
    - a. Agree to vacate the structure(s) and remove all personal property upon nonrenewal or revocation of the permit within a reasonable time period established by the District Ranger or Monument Ranger;
    - b. Acknowledge in writing that they have no interest in the real property on which the structure(s) are constructed and that any cabin or related structure constructed under the authority of the Special Use Authorization shall be the property of the United States; and

- c. Submit with their applications a sketch or photograph and a map of the proposed structure(s) showing the specific geographical location.
  - 6. Special Use Permits will contain the following provision: "Chainsaws, generators or other motorized equipment shall not be used in the permit area unless specifically approved by the Regional Forester."
- C. Cabins and related structures that were in place on December 2, 1980, for which a valid authorization does not exist, may be authorized with a nontransferable renewable 5-year Special Use Authorization by the Regional Forester for traditional and customary uses if the use is compatible with the Wilderness. No permits shall be issued for private recreational use. These permits shall be renewed until the death of the last immediate family member using the cabin as a dwelling. Revocation of the permit must be by the Regional Forester, after notice and hearing establish that continued use is causing, or may cause, significant harm to the Wilderness (ANILCA, 1303(b)).
  - 1. To qualify for an authorization, the applicant must:
    - a. Demonstrate by affidavit, bill of sale, or other documentation, proof of possessory interests or rights of occupancy in the cabin;
    - b. Submit a list of all immediate family members;
    - c. Submit a sketch or photograph and a map of the cabin and related structures showing its geographic location;
    - d. Agree to vacate all structures and remove all personal property within a reasonable time period established by the District Ranger or Monument Ranger; and
    - e. Acknowledge, in writing, that there is no interest in the real property on which the cabin and structures are located.
  - 2. The use of motorized ground equipment, not designed for personal transport use, is authorized in and about authorized structures and facilities in the permitted area for a period not to exceed the termination or the revocation of the authorization. Authorized ground equipment includes chainsaws, generators, power brushcutters, and other handheld tools and appliances, but do not include all-terrain vehicles, motorcycles, or other types of off-highway vehicles (OHVs), except snowmachines. Power lawnmowers, rototillers, and other power garden equipment may be used only on existing lawns and gardens that were established prior to the designation of the area as Wilderness.
  - 3. Cabins and associated structures that do not qualify for Special Use Authorization shall be removed by the owner unless accepted as a donation to the United States. Cabins that remain will be posted as property of the United States. Cabins that may be useful for emergency shelter may be designated by the Forest Service officer with delegated authority as public use cabins or posted for use as emergency public shelters.
- D. Renew existing valid Special Use Authorizations for cabins, homesites, or similar structures, which were in effect on December 2, 1980, unless the Forest Service officer with delegated authority finds, following notice to the permittee and after the permittee has had a reasonable opportunity to respond, that the permitted structure constitutes a direct threat or a significant impairment to the Wilderness (ANILCA, Section 1303(d) and Section 101 (b)).
  - 1. Authorizations in effect on December 2, 1980, will be considered for renewal in accordance with provisions of the existing authorization and reasonable regulations that may be prescribed.
  - 2. The structures authorized by these authorizations may be maintained, rehabilitated, modified, replaced, or removed, but not enlarged.
  - 3. All modifications and replacement plans will require form, color, and materials that blend and are compatible with the immediate and surrounding Wilderness landscape.
  - 4. In the case of conflicts that could lead to termination of the permit, the permittee will be offered reasonable opportunity to correct the conflict.
  - 5. The Special Use Authorization may be transferred at the election or death of the original permittee. The original permittee is the one of record on December 2, 1980. This is a transfer of the authorization in effect on December 2, 1980—not the issuance of a new Special Use Authorization. The transfer may be accomplished following the normal procedures except that the Special Use Authorization will be amended to change the name of the permittee instead of issuing a new authorization.

6. The amendment will also contain the following tenure clauses:
  - a. This permit is nontransferable, and a new permit will not be issued to any subsequent owner of the improvements or to any person holding any interest in the improvements.
  - b. If the present permittee, herein named, ceases to have personal need for, or to make personal use of, the site for the purpose for which the permit is issued, this permit will terminate and the structures on the area shall be disposed of as provided in the conditions of the permit.
  - c. No additional improvements shall be constructed without prior written approval by the Forest Service officer with delegated authority.
  - d. The use of motorized ground equipment, not designed for personal transport use, is authorized in and about authorized structures and facilities on the permitted area for a period not to exceed the termination or the revocation of this authorization. Authorized ground equipment includes chainsaws, generators, power brushcutters, and other hand-held tools and appliances, but do not include all-terrain vehicles, motorcycles, or other types of OHVs, except snowmachines. Power lawnmowers, rototillers, and other power garden equipment may be used only on existing lawns and gardens that were established prior to the designation of the area as Wilderness.
- E. Provide for the continuance of existing and future establishment and use of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly related to and necessary for the taking of fish and wildlife in accordance with ANILCA (Section 1316). Regulate these temporary facilities as follows:
  1. Permits are limited to a period not to exceed 1 year, but may be renewed.
  2. Authorized facilities and/or equipment must be directly and necessarily related to the taking of fish and wildlife. Permits will only be issued when the following conditions are met:
    - a. The facilities are needed as a practical necessity to conduct legal hunting, trapping, and fishing activities that occur either within the Wilderness or in adjacent waters.
    - b. The applicant has no feasible alternative location outside the Wilderness.
  3. Does not include cabins.
  4. Does not include motorized forms of transportation other than snowmachines, motorboats, or fixed-wing airplanes.
  5. The specific location of temporary facilities will not cause physical resource damage, and should be located and designed to minimize conflicts with other users.
  6. Tent platforms, toilets, or other constructed facilities should be located approximately 0.5 mile, or more, from popular beaches, lakes, recreational boat anchorages (both developed and undeveloped), or other special recreation places. Consider season of use, compatibility of activities, core use areas, the goals, objectives, and desired conditions for the Wilderness, consistency with the ROS setting, and other factors in assessing the 0.5-mile guideline.
  7. Temporary camp facilities in Wilderness will include at least the following conditions:
    - a. The time of occupancy will be limited to coincide with the hunting or fishing season for the species for which the temporary facility is being used.
    - b. At the end of the specified occupancy, tents will be taken down and tent platforms laid flat. Unnecessary equipment will be removed from the site.
    - c. Temporary structures will be built with materials that blend with and are visually compatible with the surrounding landscape.
    - d. Temporary facilities will be screened from the water, and located so that they are unobtrusive as seen from trails and areas of public use.
  8. The Forest Service officer with delegated authority may determine, after adequate public notice, that the establishment and use of new facilities or equipment would constitute a significant expansion of existing facilities or uses that would be detrimental to the purposes for which the Wilderness was established, including its wilderness character. Upon such determination, the Forest Service officer with delegated authority may deny the use or establishment of new facilities and equipment in accordance with ANILCA, Section 1316 (b).
- F. Allow reasonable access to, and operation and maintenance of existing air and water navigation aids, communication sites, and related facilities, as well as existing facilities for national defense purposes, weather, climate, and fisheries research and monitoring. Allow the continuation of

necessary motorized access at existing sites (ANILCA, Section 1310(a)). New facilities proposed for these activities and purposes, except communications sites, shall be permitted: 1) following consultation between the head of the federal agency undertaking the establishment, operation, or maintenance, and the Forest Service officer with delegated authority; and 2) in accordance with such terms and conditions as may be mutually agreed upon in order to minimize the adverse effects of such activities on the Wilderness resources (ANILCA, Section 1310).

1. Perform environmental analysis to evaluate the effects of such proposals on Wilderness resources and to provide the basis for determining the necessary terms and conditions under which the use will be permitted.
  2. Mechanized transport and motorized equipment may be authorized where no other feasible alternative exists.
  3. Forest Service officer(s) with delegated authority will consult with the permittees and jointly develop an operating plan, documenting procedures that will minimize impacts on the Wilderness resources without unreasonably limiting the operation and maintenance of the proposed facilities.
- G. The resorts discussed below were under permit prior to the establishment of the Monument Wildernesses. They will be administered in accordance with ANILCA provisions as follows:
1. Thayer Lake Lodge. Section 503(j) of ANILCA provides that the Special Use Permit for Thayer Lake Lodge shall be renewed, as necessary, for the longest of either: 1) 15 years after December 2, 1980; or 2) the lifetime of the permittee, as designated in such permit as of January 1, 1979, or the surviving spouse or child of such permittee, whoever lives longer, so long as the management of the lodge remains consistent with the purposes of the Admiralty Island National Monument.
  2. Humpback Lake Chalet. The resort Special Use Permit in existence on December 2, 1980, authorized one rental cabin and appurtenant structures on Humpback Lake within Misty Fjords National Monument Wilderness. The continuation of this use is authorized by ANILCA, Section 1307(a). The existing improvements may be maintained, rehabilitated, modified, replaced, or removed, but not enlarged. New cabin construction will not be allowed. Approval of exterior color schemes, materials, and designs shall use criteria that keep the improvements unobtrusive and compatible with the surroundings. The Special Use Permit may be revised as appropriate, but the permittee must remain Sportsman Paradise Tours, the permittee on December 2, 1980. The use shall continue to be permitted so long as it remains a public recreation rental cabin, provides adequate public service, does not significantly threaten any resource, and other terms and conditions of the permit are met.
- H. Allow reasonable access to, operation, and maintenance of existing air and water navigation aids, communication sites, and related facilities, as well as existing facilities for national defense purposes, weather, climate, and fisheries research and monitoring. Allow the continuation of necessary motorized access at existing sites (ANILCA, Section 1310(a)). New facilities proposed for these activities and purposes, except communications sites, shall be permitted 1) following consultation between the head of the federal agency undertaking the establishment, operation, or maintenance, and the Forest Service officer with delegated authority; and 2) in accordance with such terms and conditions as may be mutually agreed upon in order to minimize the adverse effects of such activities on the Monument Wilderness resources.
1. Conduct environmental analysis to evaluate the effects of such proposals on Monument Wilderness resources and to provide the basis for determining the necessary terms and conditions under which the use will be permitted.
  2. Mechanized transport and motorized equipment may be authorized where no other feasible alternative exists.
  3. Forest Service officers with delegated authority will consult with the permittees and jointly develop Operating Plans, documenting procedures that will minimize impacts on the Monument Wilderness resources without unreasonably limiting the operation and maintenance of the proposed facilities.
- I. Wilderness is a Transportation and Utility System (TUS) "Avoidance Area." Transportation and utility sites and corridors may be located in the Wilderness only after an analysis of potential TUS opportunities has been completed and no feasible alternatives exist outside the Wilderness. Refer to the Transportation and Utility section for direction. ANILCA (Section 506) includes specific

exceptions for Admiralty Island National Monument Wilderness regarding the right to develop hydroelectric resources and public access and use.

- J. Onshore facilities such as waterlines, storage areas, and shoreties for mariculture shall not be permitted in Wilderness.

#### **Landline Location and Maintenance: LAND4**

- A. Provide adequate marking for the public and Forest Service employees to distinguish land ownership.
  - 1. Survey, mark, and post property lines of inholdings and adjacent private lands. Give highest priority to those landlines that are adjacent to private lands where activities or occupancies are likely to encroach into the Wilderness. The next priority is adjacent to trails, canoe routes, and other Wilderness transportation corridors or areas of frequent human use.
- B. Provide adequate marking of Wilderness boundaries to prevent encroachment of non-compatible activities from adjacent public lands.
- C. Determine survey, marking, and posting priorities by the degree to which adjacent land management is compatible with the adjacent Wilderness.

#### **Land Ownership Adjustments: LAND6**

- A. Acquire private inholdings as opportunities arise.
  - 1. Acquisition of private inholdings within the Wilderness is a continuing high priority.
  - 2. As opportunities arise, acquire private inholdings through donation, exchange, or purchase.

#### **MINERALS AND Minerals and Geology Administration: MG1 and MG2**

##### **GEOLOGY** *Forest Lands Withdrawn from Mineral Entry*

- A. Forest lands within Wilderness are withdrawn from mineral entry subject to valid existing rights.
- B. Claimants with valid claims located within the Wilderness retain valid existing rights if such rights were established prior to the date that Wilderness lands were withdrawn from mineral entry.
- C. Permit reasonable access to mining claims in accordance with the provisions of approved Plan of Operations (ANILCA, Section 1110(b)).
- D. Section 1010 of ANILCA provides for the assessment of oil, gas, and other mineral potential on all public lands in Alaska. Core and test drilling for geologic information purposes, but excluding exploratory oil and gas test wells, may be authorized within Wilderness. Air access shall be permitted for such assessment activities. Sections 503, 504, and 505 of ANILCA provide specific direction for minerals management in the National Monument.
- E. Encourage use of state-of-the-art techniques for developing mineral resources to reduce impacts to Wilderness values to the extent feasible. Include mitigation measures that are compatible with the proposed development and commensurate with potential resource impacts.
- F. The use of motorized equipment may be authorized. Apply appropriate Transportation Forest-wide Standards and Guidelines to the location and construction of mining roads (ANILCA, Section 1110 (b)).

#### **RECREATION AND Recreation Use Administration: REC3**

##### **TOURISM** *Recreation Management and Operations*

- A. To the degree consistent with the Wilderness designation, provide a spectrum of wildland recreation opportunities that reflects the inherent ecological, cultural, historical, prehistorical, scientific, and sociological conditions found within the Wilderness.
- B. Emphasize the management of the Primitive ROS setting that acknowledges existing opportunities, while recognizing exceptions due to ANILCA or other authorizations and development activities outside of Wilderness. Provide for the appropriate activities throughout the Wilderness. Protect the integrity of the Wilderness character through integrated project planning and implementation.
  - 1. Manage for the adopted ROS class where established through Wilderness plans. If adopted ROS classes do not exist for the specific Wilderness, emphasize management for the Primitive ROS class, unless activities and practices allowed by ANILCA are authorized by the Forest Service officer with delegated authority and cause change in the ROS setting(s). Seek to minimize the changes through project design and mitigation.

2. Commercial services may be performed within the Wilderness to the extent necessary for activities that are proper for realizing the recreational or other Wilderness purposes of the area. A determination of a need for commercial services will be a separate evaluation for each wilderness area. A commercial needs assessment can be revised periodically to address current management issues. (Note: Taken out of the previous paragraph and highlighted as its own issue)

3. Seek to minimize changes to the setting through project design and mitigation. Maintain the capability of the Wilderness to emphasize quality primitive recreation on a sustained basis.

B. Manage recreation activities to meet appropriate levels of social encounters, on-site development, methods of access, and visitor impacts indicated for either the adopted ROS class or emphasizing the more Primitive ROS class (see "B" above). (Consult national and regional handbooks.)

C. Group size is limited to no more than 12 persons for commercial or general public use of a Wilderness unless otherwise approved by the appropriate line officer. Exceptions may be approved by the District Ranger or Monument Ranger in response to ~~unusual~~ **specific circumstances**. Recurring exceptions should be justified in local area analyses or decision documents. Exceptions for general public use authorized by the Forest Plan include:

1. The Stikine River Valley and tidal estuary below 100 feet elevation, not including Shakes Valley upstream from the outlet of Shakes Lake.

2. Length of stay at any one location is limited to 14 days with the exception of uses approved through a Special Use Permit.

3. At no time will caches or storage of equipment be allowed unless approved by the appropriate line officer by a special use authorization.

4. Management restrictions on visitor behavior will be primarily for resource protection and to minimize conflicts.

5. Work to preserve outstanding opportunities for solitude or a primitive, unconfined type of recreation experience. ~~Use~~ **Recreation use** will not be encouraged to ~~expand~~ **expand** into ~~more~~ **other** pristine areas as a means of resolving conflicts in areas of concentrated use.

6. **Do not authorize more than two commercial recreation groups of 12 people or less (including guides) from a single vessel or other means of transport into a wilderness area. No more than 24 individuals from a vessel may use a specific wilderness in a single day. These groups are required to disperse out of sight and sound from each other when using National Forest System lands to minimize impacts to a specific site or others using the area.**

7. Encounters should be less than three groups per day to maintain the more primitive experience.

D. Where applicable, provide for general public use of the Wilderness in accordance with ANILCA provisions for the use of snowmachines (during periods of adequate snow cover), motorboats, fixed-wing airplanes, and nonmotorized surface transportation methods for traditional activities that are legal and for travel to and from villages and homesites (ANILCA, Section 1110). Designation of motorized routes for OHVs in Wilderness areas is not allowed except for instances where documented local traditional use for subsistence activities has occurred prior to ANILCA (1980), or the area is designated as a Wilderness.

1. Traditional activities include, but are not limited to, recreation activities such as sport fishing, sport hunting, boating, sightseeing, and hiking.

2. Legal traditional activities shall be allowed to continue where such use has previously occurred. No proof of pre-existing use will be required in order to use a snowmachine, motorboat, or fixed-wing airplane. No permits will be required for the general public to use these specific types of motorized transport or any nonmotorized surface transportation methods for traditional activities that are legal, unless an area is specifically closed to public use. Such use is subject to reasonable regulation by the Forest Service officer with delegated authority to protect Wilderness resources and other values from damage.

3. Restrictions or closures of specific areas within the Wilderness to transportation methods listed in "D" above may be invoked by the Forest Service officer with delegated authority following adequate public notice and public hearing, and the determination that such use would be detrimental to Wilderness resources and values. Closure of broad areas is not contemplated.

4. Fixed-wing airplanes will be allowed to land on all suitable lakes, beaches, and icefields without a permit unless the activity (i.e., commercial use) requires a permit.

5. The landing of helicopters for access by the general public is prohibited.
- E. **The maintenance of** Maintain existing public use cabins and shelters at present or improved condition **is permitted**. Consider additional public use cabins and/or shelters; **or relocating an existing facility**; only when needed for health and safety purposes (ANILCA, Section 1315(d)).
1. Base new cabin or shelter locations on an analysis of public health and safety needs. The analysis shall include at least the following factors:
    - a) Difficulty of access, particularly in regard to timely pick-up of users by floatplane or boat, or for emergency situations;
    - b) Presence of natural hazards including weather, brown bears, and dangerous tide and currents;
    - c) History of fatalities and life-threatening incidents in the area; and
    - d) ~~Natural attractions that entice people to use a particular area.~~ **(Not a health and safety consideration.)**
  2. Design of new or replacement cabins or shelters will use drawings approved for use in Wilderness.
  3. Appurtenant structures to the cabin or shelter will be limited to a toilet, a woodshed, and minimum structures necessary for resource protection and **minimum requirements to meet accessibility specified in the** Architectural Barriers Act of 1968 (ABA).
  4. All structures shall be built of materials that blend with, and are compatible with, the foreground and middleground landscape surrounding the site.
  5. Decisions to construct new cabins or relocate or move existing cabins must be supported by an environmental analysis.
  6. The Forest Supervisor will inform Congress regarding any proposed public use cabin or shelter removal or additions (ANILCA, Section 1315(d)). **The decision to remove a cabin or shelter will be made by the Regional Forester.**
  7. ~~Report Wilderness managed to standard through INFRA each year.~~ **(Not really a FP standard and guideline; more of an internal requirement.)**
- F. All users will be encouraged to follow "Leave No Trace" practices. With the help of user groups, develop ways to distribute information for "Leave No Trace" practices.
- G. Maintain the recreation campsite inventories to help determine changes to Wilderness character and to meet minimum stewardship levels as provided through national direction.

#### *Outfitter/Guide Operations*

- A. Special Use Authorizations permitting individuals or organizations to provide visitor services in Wilderness may be issued if there is demonstrated need for the service(s) and they are deemed appropriate for the area proposed. District Rangers and Monument Rangers will maintain a record of currently active authorizations.
1. In selecting persons to provide new visitor services, except for guided hunting and sport fishing, preference shall be given to: **a)** the Native corporation most directly affected by the establishment of the subject Wilderness, and **b)** local residents defined by the Secretary of Agriculture (ANILCA, Section 1307; **FSH Regional Supplement 2323.13g**).
  2. Outfitter and guide permit holders may be authorized the use of assigned temporary campsites for specific dates within a use season. Assigned campsites shall not include structures such as tent platforms or equipment caches (except as in 3. below).
  3. Outfitter and guide services for the taking of fish and wildlife may be allowed certain temporary camp facilities by ANILCA, Section 1316. (See Lands section.)
  4. Authorize a party size of no more than 12 persons for any one site or activity. District Rangers or Monument Rangers may approve exceptions to this party size limitation in response to extremely unusual circumstances. Recurring exceptions should be justified in local area analyses or decision documents.
  5. Outfitter and guide operating plans for Wilderness direct permit holders to model appropriate Wilderness practices and incorporate appreciation for Wilderness values in their interaction with clients and others.

#### *Recreation Special Uses*

- A. Major and minor developments other than those specifically provided for in ANILCA or other applicable Wilderness designation acts are illegal or not consistent with agency policy and regulations. Refer to the Recreation and Tourism Forest-wide Standards and Guidelines.

**SCENERY Scenery Operations: SCENE1**

- A. Design activities to not be visually evident to the casual observer.
  - 1. Apply Forest-wide Standards and Guidelines for the Very High or High Scenic Integrity Objective. This objective defines the maximum limit of allowable change to the visual character of the area. Less visible evidence of activities, such as those compatible with the Very High Scenic Integrity Objective, is preferred.
  - 2. Design allowed structures, campsites, and constructed trails to meet the Moderate Scenic Integrity Objective.

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**SOIL AND WATER Watershed Resource Improvements: SW4**

A. Undertake watershed improvements only where deteriorated soil and hydrologic conditions caused by humans or their influences create a threat or loss of Wilderness values, or where such conditions could cause serious depreciation of important environmental qualities outside of the Wilderness.

For exceptions, see the Fish section.

B. Whenever possible, use indigenous plant species and materials in implementing watershed improvements.

**SUBSISTENCE Subsistence: SUB**

A. Rural residents engaged in subsistence uses shall have reasonable access to subsistence resources. Appropriate use of snowmachines, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents shall be permitted, subject to reasonable regulation to protect Wilderness resource values (ANILCA Section 811). The use of other mechanical/motorized equipment, such as chainsaws, is allowed by permit only.

**TIMBER Timber Resource Planning: TIM4**

A. Forested land in the Wilderness is classified as unsuitable for timber production and withdrawn from the timber base.

B. The following types of public uses may be authorized if done in a manner that minimizes impacts on the Wilderness (the use of mechanical/motorized equipment, such as chainsaws, is allowed by permit only):

1. Commercial beach log salvage on Wilderness coastlines may be authorized in accordance with ANILCA, Section 1315(f). Require that the recovery of logs above mean high tide be conducted from the water without roads or use of vehicles on uplands. Beach log salvage is defined as the recovery of logs that have been lost in transit and washed up on beaches.

2. Traditional personal use wood harvesting activities, primarily: a) beach logs on coastlines that can be removed without roads or use of vehicles on uplands, and b) firewood, subject to reasonable regulations to protect Wilderness resources and values. The cutting of down trees in navigable rivers (sweepers) and removal of trees from the banks is incompatible with Wilderness objectives (the main channel of the Stikine River, which is a treaty river, is an exception). Cutting of green trees (except for emergency cutting of trolling poles) will be by permit only. (Consult ANILCA, Section 1315(f) and 36 CFR 223.10.)

3. Removal or use of trees cut as part of some other authorized administrative use within the Wilderness (e.g., clearing for a fish ladder).
4. Trees may be cut for use in construction and maintenance of authorized structures when it is not feasible to obtain the necessary material from outside the Wilderness.

**TRAILS Trail Activities: TRAI1**

- A. Provide for a diversity of outdoor recreation trail and waterway opportunities that emphasizes the Primitive ROS class, or are the minimum standard necessary to protect Wilderness values and resources. Emphasize nonmotorized and nonmechanized participation in activities such as hiking, mountaineering, spelunking, cross-country skiing, canoeing, and kayaking.
- B. Emphasize primitive recreation opportunities that are in harmony with the natural environment and consistent with the intent and purposes of the

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Wilderness Act and ANILCA or other applicable Wilderness designation acts.

C. Consider trail systems that:

1. Reconstruct and maintain trails so that they appear to be part of the Wilderness environment;
- ~~2. Create connected, multi-day trip opportunities for both land trails and water trails;~~
3. Situate trailheads and access points away from concentrated use areas;
- ~~4. Loop trail systems in connection with public use cabins;~~
5. Primarily use signs for resource protection, as necessary;
6. Install signs identifying the area as Wilderness, only as necessary, at trail junctions or trailheads; and
7. Provide Wilderness boundary signs, where necessary, at entries to inform users of the change in management or conditions.

**Trail Administration: TRAI2**

A. Trails and associated waterways leading to and within Wilderness and National Monument Wilderness often become the principal management tools for achieving management objectives. Construct and maintain trails, bridges, and signs, so they:

1. Contribute to Wilderness management goals and objectives;
2. Emphasize the Primitive ROS setting;
3. Appear to be part of the Wilderness environment and not an intrusion upon it (Consult the Forest Service Trails Management Handbook and the Alaska Region Trails Construction and Maintenance Guide); and
4. Provide protection to resources (e.g., streambanks, soils, etc.).

**TRANSPORTATION Transportation Operations: TRAN**

A. New roads, new motorized trails, and new airstrips are not permitted in the Wilderness, except where authorized by ANILCA and to access surrounded state and private land and valid mining claims subject to stipulations to protect Wilderness resources and values. Any transportation development in association with minerals operations will be in accordance with an approved Plan of Operations, and subsequent annual work plans.

B. Any existing roads in the Wilderness are closed to motorized uses unless authorized under ANILCA or other applicable Wilderness designation acts.

C. Allow use of snowmachines (during periods of adequate snow cover), motorboats, fixed-wing airplanes, and non-motorized methods of surface transportation for legal traditional activities and transportation to and from

villages and homesites, subject to reasonable regulation. (Consult ANILCA, Section 1110(a), **Forest Service Manual Regional Supplements** and Wilderness and Recreation and Tourism Sections.)

D. Provide adequate and feasible access for economic and other purposes to owners of land, including subsurface rights to land, valid mining claims, or other valid occupancies that are effectively surrounded by Wilderness.

1. The routes and types of access shall be practical in an economic sense, but do not necessarily have to be the most economically feasible alternative.

2. District Rangers or Monument Rangers will work with the landowner, or his/her authorized representative, to work out reasonable solutions that will meet the intent of ANILCA (Sections 1110(b) and 1323), while minimizing adverse impacts on Wilderness resources and values.

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### **WILDERNESS Wilderness Resource Administration: WILDER**

*Wilderness Resource Management*

A. Manage all designated Wilderness and Wilderness National Monument to maintain an enduring Wilderness resource as provided by the Wilderness Act of 1964, while providing for public access and uses specifically allowed by ANILCA (P.L. 96-487) or other applicable Wilderness designation acts. Consult Alaska Region Supplement to FSM 2320, as amended. Activities and practices authorized by ANILCA will be regulated or restricted in accordance with the special provisions of ANILCA.

1. Per ANILCA (Section 506 (a)), any right or interest in land granted or reserved in paragraph (3)(A, B, and C) shall not be subject to the provisions of the Wilderness Act.

B. Identify inventory needs for all Wilderness and National Monument Wilderness to meet minimum stewardship levels per the Wilderness Act of 1964. Accomplish baseline inventory needs commensurate with other forest inventory efforts.

C. Use available opportunities to encourage and enlist public and private sector interest groups to work together in meeting Wilderness management objectives. Emphasize programs that help in educating the public in the appropriate conduct of activities and uses within Wildernesses (e.g., "Leave No Trace").

D. To the extent feasible, minimize the impacts of administrative activities on the Wilderness resources and visitors. Administrative activities include authorized use and Wilderness resource-related work being done by other agencies and cooperators. In developing project plans, follow FMS 2300, R10 ID 2300-2006-1, FMS 2322.03 or most current version, and the guidelines described below.

1. Encourage permittees and cooperators to minimize the use of mechanized vehicles and equipment to make their presence in the Wilderness as unobtrusive as possible even though authorized.

2. The use of mechanized transport and motorized equipment by the Forest Service and other agencies for the administration of the Wilderness should be carefully considered to determine if it is necessary. Mechanized transport and motorized equipment use is subject to the following conditions:

a) Aircraft

◆ Fixed-wing airplanes may land on all suitable lakes, rivers, beaches, and icefields.

- ♦ The administrative use of helicopters may be allowed on a case-by-case basis after evaluation of the need and full consideration of all alternative options for access. Approval by the Forest Service officer with delegated authority is required for administrative use.

- ♦ Established air routes will be used to the extent feasible.

- ♦ Low flights and continuous circling should be avoided.

- ♦ Work logistics will be planned to minimize the number of aircraft flights over the Wilderness and landings within a specific area.

#### b) Motorboats on Rivers

- ♦ Motorboats may be used on rivers for all administrative purposes under the same conditions that public use is allowed.

#### c) Motorboats on Freshwater Lakes

- ♦ Outboard motors of 10 horsepower or less may be used for administering the Wilderness, gathering firewood for public use cabins, and transporting crews and equipment on lakes.

Exceptions for a larger motor may be allowed when use is

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approved by the District Ranger or Monument Ranger. (Consult FMS 2322.03.)

#### d) Chainsaws and Power Brushers

- ♦ Use of chainsaws and power brushers is allowed for trail and cabin maintenance and firewood cutting when specially authorized in writing by the Forest Service officer with delegated authority. (Consult FMS 2322.03.)

- ♦ Use of chainsaws and power brushers is allowed for trail construction and reconstruction projects when specifically authorized in writing by the Forest Service officer with delegated authority. (Consult FMS 2322.03.)

#### e) Generators and Other Motorized Tools

- ♦ Generators and other motorized tools may be used for construction/reconstruction projects only when use has been specifically authorized in writing by the Forest Service officer with delegated authority. They may not be used for normal maintenance work or in field camps, except where specifically authorized by the Forest Service officer with delegated authority.

#### f) Snowmachines

- ♦ Snowmachines may be used to administer Wilderness under the same snow conditions that public use is allowed.

#### g) Exceptions

- ♦ Aircraft and mechanized equipment may be authorized by the Forest Service officer with delegated authority as needed for search and rescue purposes and law enforcement.

- ♦ The temporary use of motorized equipment may be allowed for fisheries research, management, rehabilitation, and enhancement activities, when such use is authorized in the project environmental assessment or Decision Notice approved by the Forest Service officer with delegated authority.

- ♦ The use of chainsaws and power winches is allowed for clearing of navigational hazards along the Stikine River. All other administrative activities must be completed using primitive

nonmotorized/nonmechanized methods when specifically authorized by the Forest Service officer with delegated authority. (Consult FMS 2322.03.)

#### *Wilderness Planning*

A. Protect and perpetuate Wilderness character. Using the following four qualities, evaluate whether or not Wilderness character is degrading, stable, or improving over time:

1. Untrammelled,
2. Natural,
3. Undeveloped, and
4. Outstanding opportunities for solitude or primitive and unconfined recreation.

B. A minimum requirements analysis should be used for all management proposals and activities. (Consult FSM 2320.)

C. All mechanized transportation or motorized equipment is reported annually by all other agencies if authorized using minimum requirements analysis.

D. Update individual Wilderness plans if inconsistent with this Plan.

E. Wilderness plans may be developed or updated for an individual Wilderness in response to issues and concerns. All Wilderness plans for individual areas will be consistent with the Wilderness Act, ANILCA, or other applicable Wilderness designation acts, and this Tongass Forest Plan.

F. ROS classes may be adopted through Wilderness planning.

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G. As needed and consistent with direction in this Forest Plan, update Wilderness Implementation Schedules and any other area plans, analyses, or decision documents applicable to a Wilderness.

H. Establish subunit management zones within the Wilderness to deal with unique situations, or to integrate local issues and concerns with management activities, where necessary, to better accomplish Wilderness objectives.

1. The boundaries of subunits should generally be located on identifiable topographic features and/or coincide with existing ROS classification areas.

#### **WILDLIFE Wildlife Habitat Planning: WILD1**

A. Wildlife management activities will be consistent with Wilderness objectives, and will protect and maintain natural processes and Wilderness values.

B. Address issues regarding management, introduction, and re-introduction of wildlife species consistent with national and regional policy.

#### **Wildlife Habitat Improvement: WILD2**

A. Conduct wildlife habitat improvement projects only when the principal objective is to protect or restore the Wilderness resource, or to assist in the recovery of a federally listed threatened or endangered species.

#### **4.74 GEOGRAPHY – ADMIRALTY ISLAND/NATIONAL MONUMENT**

Comments specific to the Admiralty National Monument are listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

Admiralty Island National Monument and Kootznoowoo Wilderness: A comprehensive plan is needed for the entire island that reflects those values detailed in the Presidential Proclamation, Legislation and TLMP. Develop a specific strategy for scientific studies in partnership with scientific institutions and individual scientists. Consider Tlingit culture as one of the rarest and most vulnerable values of Admiralty. Develop an emphasis that enhances preservation of the cultural aspects (including traditional subsistence). Develop a Greens Creek/Hecla mitigation plan that is favorable to Angoon. Consider the purchase of the Shee Atika/Cube Cove lands as a priority, starting with the Lake Florence drainage.

#### **4.75 GEOGRAPHY – HOONAH RANGER DISTRICT**

Comments specific to the Hoonah Ranger District are listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

Pelican, Alaska has a rich resource of hydroelectricity that could be shared with Hoonah. Geothermal and tidal resources could augment the system to provide the NE Chichagof communities with affordable electrical energy. The plan does little to protect coastal communities in the rural areas of SE Alaska. A balance of interests should be crafted that protects the existence of these communities in the Tongass. New technologies can be used to minimize the impacts to the environment and to lay utility corridors for communities in need of affordable power and which will further reduce greenhouse emissions.

Mud Bay interior on northern Chichagof Is. This is a rich area of salmon, trout and brown bear - much more valuable for these species than for timber. Behind Hoonah on northern Chichagof Is. - unfortunately so much nearby Native Corporation land belonging to both Sealaska and Hoonah Totem has been logged that the remaining Forest Service land in that area (much of which has also been logged) should be left alone. The east side of Tenakee Inlet would also be overly harvested under the "Timber" classification.

#### 4.76 GEOGRAPHY – JUNEAU RANGER DISTRICT

Comments specific to the Juneau Ranger District are listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

<p>By our count, 51.1% of the landmass within the boundaries of the Haines Borough belongs to the US Forest Service as the Tongass National Forest. Given the huge impact planning decisions for the Tongass will have on our Borough, please schedule a public meeting here to help us understand the existing plan. We promise to attend! [TNF Response: Thank you for your request for a meeting in Haines Borough. I cannot promise that we can schedule a meeting in Haines, at this time. Please give me a few days to contact the correct people and see if I can work out the logistics. The earliest I have available for a meeting is mid-March. Do you have dates in March that would work best for you?]</p>
<p>Some of the comments presented regarding timber harvests are not accurate. The Tongass forest management regime is dynamic and good forest management is possible. The highest concentration of bears in the Tongass is by the West Fork River because—due to timber harvesting—that is where the food is located. Foresters can create old growth conditions by identifying the vertical and horizontal structure desired within a stand.</p>
<p>Cruise Ship Pollution (one commenter) It is local knowledge that there is an impact from cruise ship pollution on the forest in Skagway. The Municipality of Skagway is considering a new hydro project in part to allow shoreline connection of cruise ships to power to reduce air quality impacts. Skagway’s air quality impacts Haines, so we are interested in this. The Tongass isn’t being managed the way it should be, if these air quality threats are arising.</p>
<p>The 2008 TLMP’s Timber Sale Program Adaptive Management Strategy (TSPAMS) Falls Short. The 2008 Amendment acknowledged to some degree the importance of other competing and valuable uses for spectacular Tongass wildlands. Under the TSPAMS, logging was delayed on exceptional wildlands like Neka Bay, Ushk Bay, Port Camden, East Kuiu, Port Houghton, the Back Channel, and the Cleveland Peninsula. Although described as an “adaptive management approach,” the fact of the matter is these lands remain in the timber base. A consequence of this strategy is continued targeting of the remaining large-tree and cedar forest on the developed land base and reduced landscape integrity within these watersheds.</p>
<p>Looking at the Tongass land management plan map, I was disturbed to see how many areas are classified “Timber management” - dark green on the map. Point Couverden area for one, which has only a narrow fringe designated for scenic “window dressing.” I have followed the history of sales on the nearby “Homeshore” area, where logging was heavily subsidized by the Forest Service paying for road building, else little would have sold. The Homeshore area has been a loser for the Forest Service and for the taxpayer.</p>

Executive Council of the Central Council Tlingit and Haida Indian Tribes of Alaska  
Resolution EC/ 13-23 Title: Support of the Alaska Miners Association Proposed Amendments to the 2008 Amended Tongass Land and Resource Management Plan WHEREAS, the Alaska Miners Association (AMA) is a non-profit membership organization comprised of more than 1,500 individual prospectors, geologists, engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, molybdenum, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials. WHEREAS, AMA has seven statewide branches, including two located in Juneau and Ketchikan/Prince of Wales Island. These two branches represent a large portion of the mining community in Southeast Alaska. The positive economic and social impact of AMA members is significant for the citizens who reside in the Tongass National Forest (TNF). AMA members range in size from Southeast Alaska's largest private employers to small prospector operations, including many small businesses with ten or fewer employees. The 700 jobs provided on a minimal number of TNF acres by the Greens Creek and Kensington Mines have been an important addition to the economic and social fabric of Southeast Alaska.

The Juneau Chamber of Commerce supports construction of a road up Lynn Canal linking Juneau with rest of the State. This road right of way traverses Inventoried Roadless Areas. The Juneau Chamber of Commerce (JCC) is harmed by the significant new obstacle the 2001 Roadless Rule presents to the approval the road has already obtained from the Federal Highway Administration

Juneau is served by hydroelectric power from the Snettisham Dam and the Lake Dorothy Dam. As Juneau's power needs increase, the community will need the potential of additional renewable energy opportunities such as hydro power, geothermal power, and other renewable energy Resource that exist in the IRA that surround Juneau to fill that need. The JCC is harmed by the inability of its members to construct the road and transmission lines necessary to develop the potential renewable energy sites and to distribute such power as a consequence of the reinstatement of the 2001 Roadless Rule

[ENER 3 SOCIO 2 GEO LUD NEW/Energy] Such a Renewable Energy Resource Plan and a Renewable Energy Resource Development LUD must be added to the 2008 Amended Forest Plan because neither the 2001 Roadless Rule nor the 2008 Amended Forest Plan considered or analyzed the economic opportunities, or the job opportunities related to the development of renewable energy resource on the TNF. Conversely, neither Plan discussed the lost job and lost economic opportunities of not authorizing the development of renewable energy resource in rural Southeast Alaska communities. The Forest Service acknowledged this in its July 15, 2003 rulemaking to exempt the TNF from the 2001 Roadless Rule: There are thirty two communities within the boundary of the TNF. Most Southeast Alaska communities lack road and utility connections to other communities and to mainland systems. Because most Southeast Alaska communities are surrounded on land by IRAs of the TNF, the roadless rule significantly limits the ability of communities to develop road and utility connections that

almost all other communities in the United States take for granted. If the proposed rule [to exempt the TNF from the roadless rule] is adopted, communities in Southeast Alaska would be able to propose road and utility connections across national forest system land that will benefit their communities. While the JCC intends to submit a separate letter in response to the Five Year review in support of a Forest Plan amendment to add a Renewable Energy Resource LUD, mining throughout Southeast Alaska would be greatly advantaged by the availability of renewable energy to offset the cost of diesel in operating mine in rural Southeast Alaska. It is important to point that diesel back up will be required, and is a capital cost, even where hydroelectric power is available. But, renewable energy, especially hydropower, can significantly reduce the operating costs of a mine. The Greens Creek Mine is greatly advantaged by the availability of hydropower from AEL&P. The Kensington Mine would benefit if low cost, renewable energy were available to it. The projects being developed on Prince of Wales Island (Niblack and Bokan Mountain) are good examples of mines that could benefit from renewable energy. It follows that the proposed Renewable Energy Resource LUD should be added to the Forest Plan to reduce the cost of power and to provide mining and other jobs in rural Southeast Alaska.

The attached AMA letter sets out the practical obstacles imposed upon mining by the changes listed above, all of which are of great concern to the JCC. Two points made in the AMA letter are of a particular concern, and repeated here, because the practical restriction on mining they describe could be applied to the Greens Creek and Kensington Mine and the Herbert Glacier projects currently under development, all of which directly affect the economy of Juneau: While “reasonable access” to locatable minerals is technically authorized in Wilderness and IRAs under 36 C.F.R. Part 228, there are very few mines in Wilderness Areas. Even though the 2001 Roadless Rule specifies: “Reasonable rights of access may include, but are not limited to, road construction and reconstruction, helicopters, or other non-motorized access” (FEIS Vol. 1, 3-329 to 3-350),<sup>2</sup> the experience of the mining community is that Special Use Permits authorizing road access in or near Wilderness Areas are very difficult to obtain. Experience teaches that the same practical adverse result can be expected in IRAs. For example, the Quartz Hill Project was adjacent to the Misty Fjords Wilderness Study Area. In 1977 the Forest Service denied a Special Use Permit to US Borax to construct a road for a bulk sample of 5,000 tons of ore at the Quartz Hill Project, requiring access to be by helicopter. *SEACC v. Watson*, 697 F.2d 1305 (9th Cir. 1983). As the opinion shows, six years later Borax still did not have a permit to build the road needed to move that volume of ore. In sum, the Secretary of Agriculture and the Forest Service have made it clear to Forest Service officials in authority on the TNF that, notwithstanding the 9.6 million acres of IRAs and 5.6 million acres of Wilderness that surround nearly every potential project within the TNF, authorization for reasonable access for mineral exploration, development and operation and for renewable energy power site development within IRAs will be restricted, if not prohibited altogether.

#### 4.77 GEOGRAPHY – KETCHIKAN-MISTY FJORDS RANGER DISTRICT

Comments specific to the Ketchikan Ranger District are listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

<p>The Forest Service also has opposed construction access for a Bell Island geothermal project; even though such a plant would be located within a few miles of the existing first segment of a Southeast power intertie.</p>
<p>When planning for managing the Neets Bay parcel contact SSRAA for preferred buffer zones around Bluff Lake, Neets Lake, and Neets Creek. These are very sensitive areas due to the water from these three systems feeds Neets Bay Hatchery. We incubate and release over 150 million salmon annual into the common property waters of the state of Alaska. We want to preserve and protect this program that brings so much benefit to the people and businesses of southeast Alaska.</p>
<p>Consider revising the Plan to omit unnecessary visual priority routes such as Carroll Inlet.</p>
<p>I would like to nominate the Unuk for a Wild and Scenic river. Rivers are the lifeblood of our coastal environment and must be set aside for all people, not used as a dumping ground for a Canadian mining company.</p>
<p>Back in 2008 SSRAA applied for a special use permit from the USDA Forest Service to conduct a coho salmon lake-rearing project in Connell Lake near Ward Cove, Alaska. Our request was denied because the land use designation was "recreational" and we were considered a "commercial" operation. Our company is a private not-for-profit organization that enhances the salmon resource in the marine waters of the state of Alaska. We do not sell our product. SSRAA takes salmon eggs, incubates/hatches those eggs in hatcheries, and raises them to the smolt stage and releases these juvenile salmon into the marine waters of the state of Alaska. We do not charge for this service but receive operating funds from commercial salmon fishermen and from the sale of our returning adult fish to our hatcheries. We request that the land use designation for the Connell Lake area be changed such that we may use this fresh water resource for rearing yearling salmon smolt for the benefit of Southeast Alaska residents.</p>
<p>Modify the Connell Lake LUD to allow for Coho salmon rearing (two commenters) The Southern Southeast Regional Aquaculture Association (SSRAA) would like to see the LUD amended for the Connell Lake area so SSRAA can use the lake for coho salmon enhancement. Connell Lake is a manmade lake on the Ward Cove road system. SSRAA hatcheries are at full capacity and the best option for additional yearling fry is lake-rearing in Connell Lake. The State usually has jurisdiction for lakes or water bodies and in 2008 the Alaska Department of Natural Resources indicated it was not opposed to SSRAA supplying Connell Lake with salmon, but the Forest Service claimed the lake was under federal jurisdiction. SSRAA asked</p>

the Forest Service for a special use permit to use Connell Lake, but in 2009 the Forest Service explained that the Recreation LUD does not allow salmon rearing. SSRAA believes salmon stocking of the lake is recreational in nature because this supports recreational fishing. SSRAA would like the LUD to be amended so SSRAA can access and raise fish in Connell Lake. The stream could also have educational use through teaching children how hatcheries work. Connell Lake used to be silver stream (prior to the pulp mill) and the Forest Service should allow SSRAA to restore salmon runs here.

Additional funds are needed to provide continued monitoring of heritage resources. Specifically, funding for the Tongass Ranger Vessel that had been utilized for cultural and traditional heritage site monitoring needs to be restored. A good example of why such funding is needed is the petroglyphs of Leask Cove. Logging operations in that area resulted in loggers desecrating the petroglyphs by carving Donald Duck.

More funding is needed for trail work (one commenter) The Regional Advisory Council (RAC) for Ketchikan works to improve local trails, but there is not enough funding. RAC members select only a few trails to work on due to lack of resources, and are then blamed for not selecting additional trails. It is the job of the government to provide the needed funds for additional trail work.

Concern regarding Hugh Smith Lake (one commenter) As part of Saxman's rural designation, Hugh Smith Lake was set aside for the Saxman people due to its cultural and traditional value. Recently Saxman was designated as non-rural, which could negatively impact use of this lake.

The Forest Plan should include the Marx Creek chum salmon run in Hyder, as well as the eulachon run on Carroll Creek—the only identified island run of eulachon in the world.

Amend the Land Use Designation for Special Interest Areas. Connell Lake is identified in the Forest Plan Land Use Designation map as a Special Interest Area defined as Preserve areas with unique archeological, historical, scenic, geological, botanical, or zoological values. Fish Habitat Planning is identified in the Forest Plan as a permitted activity within the Special Interest Area and provides for the goal of restoring and maintaining fish production in the State of Alaska to optimum sustained yield levels and in a manner that adequately ensures protection, preservation, enhancement, and rehabilitation of the Wilderness resource. Fish Habitat Planning is further identified within the Forest Plan to provide improvements such as fishways, fish hatcheries, or aquaculture sites that may be built. Appropriate landscape management techniques will be applied in the design and construction of such improvements to reduce impacts on recreational resources and scenery. The Council encourages the addition of a specific use designation for fish pens within the Special Interest Area, facilitating the use of Connell Lake by the Southern Southeast Regional Aquaculture Association for salmon stock pens.

Incorporate Lake Grace Hydropower into the Forest Plan. Lake Grace has the potential to produce much needed hydropower to the southern southeast region of Alaska and should be incorporated into the Forest Plan. The Council encourages an amendment of the Forest Plan that reflects uses that provide sustainable, renewable, and affordable energy to Alaskans.

Recognition of the Vallenar Bay Road. The Vallenar Bay Road provides access for marketable timber sales, as well as access to residential properties that currently do not have roaded access. Access to the timber for harvest would provide significant economic benefit to the City residents. The Council encourages the US Forest Service to amend the Forest Plan to recognize the proposed Vallenar Bay Road and include it on the Land Use Designation Map.

Blank Inlet Land Access Route. The Council encourages recognition of a land access route from the Gravina Highway on Gravina Island to Blank Inlet on Gravina Island within the Forest Plan. The Council encourages the US Forest Service to amend the Forest Plan to recognize a land access route to Blank Inlet. Land access to this area provides economic and recreational opportunities important to the City.

Access to the Misty Fjords National Monument, Traitors Cove Viewing Observatory. US Senator Lisa Murkowski wrote the US Forest Service on March 22, 2013, expressing concern about the reduction of permits to the Misty Fjords Monument. The Council supports Senator Murkowski's position and encourages the US Forest Service to amend the Forest Plan to include the use of recreation on the Land Use Designation map around Traitors Cove and the areas currently permitted for the Misty Fjords National Monument.

Deer numbers have diminished throughout southeast, many blaming wolves for lesser numbers. However, the lack of south facing slopes, essential for deer survival during snowy winters, has had more of an effect on deer population than wolves. The Forest Service is charged with protecting the Tongass for all species, not just those connected to the timber industry, and certainly not to the elimination of the Alexander Archipelago wolves. Instead of glossing over damage done to riparian areas and winter habitat, the Forest Service must guarantee that deer have sufficient forage areas so their numbers can increase. As I hike during the summer, I look for deer sign but find very little. Each fall it becomes increasingly difficult to find a buck on Revilla Island.

SSRAA continues to have interest in using Connell Lake. The lake is on the road system, which makes it an economically viable location for the salmon enhancement project. The operation would be low profile. SSRAA was apparently deemed unsuitable to use the location because SSRAA is considered to be a commercial enterprise, but that is not entirely correct: while this would be a larger enterprise than private use, we raise fish and we let them go in the common property of the State of Alaska, and we do not sell anything. The Forest Service should amend the LUD for this area in order to permit SSRAA to raise Coho salmon in the lake. SSRAA has essentially used up alternative fresh water sources at Whitman Lake, Neets Bay, Crystal Lake, and Burnett Inlet, and needs this location to expand our operation.

The SSRAA board would like the Forest Service to amend the LUD so we can access and raise fish in Connell Lake.

I also have a comment regarding the monitoring of sacred sites. I participated in monitoring at Show Cove and on the Saddle Lake Road. As part of this monitoring trip, I also spent some time at Leask Cove where there were petroglyphs that had been very well preserved. The area was logged in the early 1900's and 1940's. Recently logging operations have restarted in that area and the loggers contaminated this site by carving Donald Duck into the petroglyph wall. These areas also have years of human waste, from logging and weekend expeditions. One solution might include using solar powered panels to remediate human waste left from beach camping or culture camp visits. We need to contain our waste.

The Connell Lake system used to have a silver salmon stream prior to the pulp mill. Connell Lake is an excellent location to raise silver salmon. Salmon rearing should be considered a recreational use because they are fished for recreationally. The operation could also have educational uses by teaching children how hatcheries work.

In a previous version of the Forest Plan, certain fish stocks that crossed the forest were identified in the Plan, but in the current version of the Plan references to these fish stocks were removed. I would like two fish stocks to be reviewed for inclusion in the Forest Plan including the Marx Creek chum salmon near Hyder and the Carroll Creek run of eulachon. This eulachon run is unique, as it is one of the only identified island runs of eulachon in the world.

The biologist also told me that deer are particularly vulnerable when they get into the pockets of timber in places like big muskegs with little pockets of timber in the middle – and openings all around. Deer get into the timber stands and think they are safe, but the wolves surround the area and chase the deer out. It is interesting to me that when the deer populations began to decline in the Petersburg area, it was around the time that a great deal of logging was occurring on Kupreanof. I wonder if logging, the roads, and the openings have something to do with the problem we are having with wolves. Many areas of Revillagigedo Island have been heavily clearcut, roaded and logged. Is it any wonder that the wolves are now coming into our back yards and getting our pets? Hunters can get back into places they could not before because of the roads. Since the Forest Service played such a big part in changing the landscape here, I would like to see them take on some of the responsibility of refurbishing these landscapes in order to bring back a healthy predator-prey balance for the deer, wolves and bears.

We like the designation of the Special Interest Area for Southern Kruzof Island. In this designation, the Forest Service has clearly recognized a place of high social, ecological, and environmental importance. We would recommend the Forest Service nominate this area for a congressional designation as a National Monument. We would like this designation to continue with the same management prescription that the area is currently under but to

develop a complimentary management and communications plan that will highlight the social/ecological/economic/historic importance of the area and more robust support of recreational, tourism, and subsistence use of the area.

Saxman was recently designated as non-rural. That designation is going to affect the Hugh Smith Lake. The Hugh Smith Lake had been set aside for Saxman because of its rural designation and the cultural value. I am not sure if this is a Forest Service issue but we need to prepare for any changes that might happen regarding the lake.

It has been some time now since I've worked on the Soule River project but there were some difficulties with how the Forest Plan address' hydroelectric projects...as in virtually silent. The TUS Overlay identifies application of this LUD for...public hydroelectric power projects (pg. 3-128) which has caused some differences from private companies coming forward to propose projects (i.e. AP&T). I some of the Natural Setting LUD groups (i.e. Remote Rec) the LUD represents a TUS "Avoidance Area"; then identifies that transportation and utility sites may be located within this LUD only after analysis of the potential TUS corridors has been completed and no feasible alternatives exist outside this LUD. Refer to the TUS section for direction. The problem with this wording - again in the case of say Soule River, we -the USFS - are not adequately staffed & prepared to A) complete an analysis to determine if other potential corridors are exist; and B) to identify other feasible alternatives. There are numerous facets involved in determining whether or not an area is adequate - we are at the mercy of the applicant - who wants the project where they want it.

The Unuk River in Misty Fjords is under threat from the KSM mine in northern British Columbia. Because this river is in a National Monument, the Forest Service has the responsibility to protect it. The Unuk feeds essential spawning habitat for king salmon, plus the other 4 species of Pacific salmon.

Hooligan, another anadromous fish has spawned in the Unuk for eons, but can no longer be harvested by Native tribes because of low numbers. The State of Alaska knows very little about the Unuk, lacking even baseline water quality data. The Eskay mine operated from 1998 to 2008; we have no reliable data as to whether or not there is acid runoff from that mine. However, something has affected hooligan runs. The Forest Service must be able to provide information on the river's health. Although fish runs will be immediately impacted by roads, mines, and the infrastructure associated with mining, other wildlife will also be negatively impacted by intensive mining. The KSM mine proposes to blast apart four mountains, leaving a huge waste rock pile next to a tributary of the Unuk. The amount of precipitation in this country will surely result in leaking the acidic contents of 4 mountains into the Unuk.

On June 17, 2013, the Assembly of the Ketchikan Gateway Borough unanimously passed Resolution Number 2471 commenting on the TLMP, encouraging changes and additions that reflect and provide relief to the restrictions resulting from the goals and objectives of the TLMP. Specifically, the following comments are provided:

- Amend the Land Use Designation (LUD) for Special Interest Areas of the Forest Plan to add the use of fish pens, allowing, in particular, use of Connell Lake by the Southern Southeast Regional Aquaculture Association for salmon stock pens.
- Approve possible roads within the LUD such as the proposed Vallenar Bay Road.
- Incorporate Lake Grace hydropower into the Forest Plan by amending it to reflect uses that provide sustainable, renewable, and affordable energy to Alaskans.
- Identify a land access route from the Gravina Highway to Blank Inlet within the LUD, providing economic and recreational opportunities important to the Borough.
- Support US Senator Lisa Murkowski's March 22, 2013 letter and encourage the Forest Plan be amended to include the use of recreation on the LUD map around Traitors Cove and the areas currently permitted for the Misty Fjords National Monument.

[RECITAL A. WHEREAS, the US Forest Service 2008 Tongass Land & Resource Management Plan (Forest Plan) evaluates its implementation five years after issuance to determine if the Forest Plan needs to be adjusted; and B. WHEREAS, the Assembly of the Ketchikan Gateway Borough (Assembly) encourages changes to the Forest Plan as reflected by this resolution to better facilitate the interests of the Ketchikan Gateway Borough (Borough) and the goals of the Forest Plan; and C. WHEREAS, the Assembly encourages the Forest Plan to reflect a comprehensive perspective of the Ketchikan Gateway Borough that recognizes the relationship of the resources and the residents so that the Forest Plan works with, not against the economic and recreational interests of the residents and businesses of the Borough; and D. WHEREAS, the suggested amendments to the Forest Plan proposed by this resolution are compatible with the goals of the Forest Plan and are keeping with the best interests of both the US Forest Service and the residents and businesses of the Borough.]

- Section 4. Incorporate Lake Grace Hydropower into the Forest Plan. Lake Grace has the potential to produce much needed hydropower to the southern southeast region of Alaska and should be incorporated into the Forest Plan. The Assembly encourages an amendment of the Forest Plan that reflects uses that provide sustainable, renewable, and affordable energy to Alaskans.
- Section 5. Recognition of the Vallenar Bay Road. The Vallenar Bay Road provides access for marketable timber sales, as well as access to residential properties that currently do not have roaded access. Access to the timber for harvest would provide significant economic benefit to the Borough residents. The Assembly encourages the US Forest Service to amend the Forest Plan to recognize the proposed Vallenar Bay Road and include it on the Land Use Designation Map.
- Section 7. Blank Inlet Land Access Route. The Assembly encourages recognition of a land access route from the Gravina Highway on Gravina Island to Blank Inlet on Gravina Island within the Forest Plan. The Assembly encourages the US Forest Service

to amend the Forest Plan to recognize a land access route to Blank Inlet. Land access to this area provides economic and recreational opportunities important to the Borough.

- Section 8. Access to the Misty Fjords National Monument Traitors Cove Viewing Observatory. US Senator Lisa Murkowski wrote the US Forest Service on March 22, 2013, expressing concern about the reduction of permits to the Misty Fjords Monument. The Assembly supports Senator Murkowski's position and encourages the US Forest Service to amend the Forest Plan to include the use of recreation on the Land Use Designation map around Traitors Cove and the areas currently permitted for the Misty Fjords National Monument.

Local predator-prey dynamics have changed due to logging, and the Forest Service needs to take responsibility (one commenter) Wolves: Predator-prey and ecosystem-forest dynamics are much more complex than can be easily understood. Sixty years ago on Gravina Island goats, chickens, cats, dogs, and deer were kept on a homestead, and there were no problems with wolves. Now wolves kill neighborhood dogs and pets. The increase of wolves followed extensive logging and road development.

#### 4.78 GEOGRAPHY – PETERSBURG RANGER DISTRICT

Comments specific to the Petersburg Ranger District are listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

<p>The lower part of Petersburg Creek should receive a more restrictive classification. It is too important a recreation area to allow any additional development – A wild and scenic river designation should be considered.</p>
<p>Transportation-Power Access: And the 2008 Forest Plan also needs to be modified to take into better account updates to the State of Alaska’s Southeast Transportation Plan and the Alaska Energy Authority’s 2011 Southeast Regional Integrated Power Plan. The plan needs to permit access for road links where needed in the region, such as the Bradfield Canal road to Canada, a road along a corridor to permit a high-voltage electric transmission line to connect with the British Columbia system, a road to permit lower-cost power transmission between Kake and Petersburg, and a road to permit cheaper construction of a power line to access Soule River (Hyder) hydroelectric development.</p>
<p>I would like to address the use of the natural resources in the Tongass National Forest, which is covered under Section 8 of ANILCA. People of Kake gather many plants from the forest for food and for use in arts &amp; crafts, plants such as (and not limited to): the many edible berries- blueberries, huckleberries, and elderberries, high and low bush cranberries, lingonberries, cloudberry. Plants used for medicines such as (and not limited to): devil's club, Labrador tea, various leaves, branches &amp; barks. Plants, barks &amp; roots used in arts &amp; crafts (and not limited to) such as red and yellow cedar wood, red &amp; yellow cedar bark, alder wood, spruce wood, spruce roots. These are gathered for personal use and the practice needs to continue.</p>
<p>The area in Kake has the furthest north Red Cedar stand. This was set aside for cultural use and the USFS needs to enforce this practice. I would like to recommend in cases where any cedar is to be commercially logged, please inform the Organized Village of Kake (federally recognized tribe), so that local weavers may gather bark prior to the commercial logging.</p>
<p>The proposed sales areas near Security Bay and the few bits of uncut forest on Wrangell Island are examples of forest land that should be protected to sustain needed biodiversity for the Tongass. Taking these reservoirs of plant diversity, and refuges from the stress of weather and encroachment away from the forest community is a too heavy price to pay for the brief benefits of a season of logging.</p>
<p>The Forest Service roads allow the Tongass to be a multi-use area, and not a forest that is simply for those involved in extractive industries. The roads allow access for berry pickers, woodcutters, photographers, hikers, and hunters; and the roads make the Tongass available for recreation and cultural uses. In some cases, the primary value of the Forest Service’s management of the Tongass is the access that roads provide for local residents. For example,</p>

the people in Kake receive very few benefits from logging in the Tongass other than recreational use of the roads along with access to moose hunting and deer hunting areas.

The Forest Plan should allow upland use adjacent to mariculture sites. In the Tongass, mariculture upland support for storage and other items is needed, especially for small operators. These needs are minimal; for example a small mariculture farm in Kake needs only 0.25 acre uplands (although the Forest Service charges for an acre).

Concern Regarding Reduced Deer Population and Level of Harvest on Mitkof Island and Lindenberg Peninsula (four commenters) Timber sales have been contrary to the USFS Conservation Strategy. The deer population on Mitkof Island and Lindenberg Peninsula has declined substantially due to clearcuts. Mitkof Island was the “bread-basket” for area residents; subsistence deer and other food is significantly reduced now, and is farther away and more dangerous to harvest as a consequence. Deer require connected old growth stands for winter feeding and safety. Clearcutting on Mitkof Island and the Lindenberg Peninsula needs to be ended to bring deer populations back.

Petersburg Creek should become a Remote LUD (three commenters) and the Wild & Scenic River Corridor should continue When the Forest Plan was revised before, Petersburg Creek was owned by Alaska Mental Health Trust, now it is Forest Service land and there is a desire to safeguard Petersburg Creek for the benefit of the community by designating an appropriate LUD. Petersburg Creek LUD should be changed from Scenic to Remote (or Wilderness), and the Wild and Scenic River Designation recommendation to Congress should continue for the length of the Creek. The public would like to be able to comment on these determinations.

There are a number of high value watersheds, on Kupreanof Island in particular, that are in development LUDs now; those LUDs should be changed to protect the salmon habitat, including Irish Creek, Keku Lakes and Creek, Kushneahin Lakes and Creek, Lovelace, Totem Bay Watershed, Tunehean Creek, Petersburg Lake and Creek, and Port Houghton.

A development LUD that allows hydro power isn't appropriate for Scenery Creek. It should be in a Remote Recreation LUD rather than a Scenic Viewshed LUD.

The following publications have been published since the 2008 review. I include comments with each to provide insights regarding the implications for the conservation strategy. I include two earlier publications that are relevant to the current review of the conservation strategy. 9. Smith, W. P. 2012. Flying squirrel demography varies between island communities with and without red squirrels. Northwest Science 86:27-38. This paper examined the question of whether red squirrels influence flying squirrel populations. Population density and survival were lower and demographic variability of flying squirrels was greater on Mitkof Island where flying squirrels occur with red squirrels as compared to POW where red squirrels are absent. These findings have several implications for the conservation strategy: 1)

ecological communities across the Tongass vary in composition, which can have implications for population dynamics of focal species and thus it is unwise to extrapolate findings from one region of the Tongass (especially an island) across the entire planning area, and 2) the previous cited paper by Smith and Person (2007) revealed that demographic variability, not total population size, had a much greater effect on the probability of persistence of flying squirrels in OGRs. Thus, everything else being equal, the probability of flying squirrels persisting in OGRs on Mitkof Island likely is less than on POW, and will vary among ecological communities across the planning area.

We are summer time residents of Tongass National Forest and are concerned about some of the TLMP. We don't like the Tongass being managed to allow an unsustainable amount of logging. We don't like the plans to cut every last bit of old-growth forest on Wrangell Island to support an export industry; we don't like the continuing cutting of sensitive already cut lands in central Prince of Wales Island and the Lindenberg Peninsula.

Maybe the most concerning trend in the last few years has been the new "one voice" policy of Governor Parnell. The Forest Service relies on State agencies— ADF&G, ADEC, and others— to provide the best available science on most wildlife. That would be wonderful, except for the fact that the State no longer provides its "best available" information. Instead, the state experts have to send their ideas and comments up their chain of command for editing and redactions by non-expert, political operatives. There is nothing wrong with the Governor pushing his ideological priorities, but there is something wrong with filtering scientific data and discussions through that ideological filter before allowing other scientists to see it. So for example, when State biologists expressed concern for wolves on Lindenberg Peninsula as a result of the Tonka timber sale, much of that information was never passed on to the Forest Service because it was edited out by DNR. Biologists said they were concerned for 2 long-term wolf viability as a result of roads and clearcuts, and had specific reasons, but that information didn't fit into the Governor's preferred narrative of urging increased timber harvest and so it was edited out. The USFS didn't create this situation, but the State's change impacts operation of the Forest Plan conservation strategy because Forest Plan is designed to work when there is a free flow of information between state & federal biologists. The Wolf S&G, for example, calls specifically for consultation with "ADF&G" biologists, not just with the State as a political entity. Given the politicization of the State's science, it can no longer fairly be presumed to be the "best available." It is the Governor's prerogative to censor his scientific employees, but when he does that the State sacrifices its ability to represent the best science.

The environmental justice implications of where timber harvest is concentrated should be more carefully considered. On Lindenberg, for example, the massive loss of deer population is a very serious impediment for those local residents who aren't fortunate enough to have access to a large vessel to make the big crossings needed to access better deer hunting areas. We expect this problem to worsen as logging becomes increasingly concentrated in the most economic areas to harvest. The most accessible timber often coincides with the most accessible deer hunting areas as well.

Petersburg Creek needs additional protection: LUD of remote or wilderness for the lower part of the creek. Apply for Wild and Scenic River designation for the lower part of Petersburg Creek

Special attention given to Kupreanof Island, especially the Lindenberg Peninsula.

The Forest Service thru its management practices and especially its LUDs needs to honor the City of Kupreanof's commitment, thru its ordinances and its planning documents which all emphasize remaining a road less community. There should be no Kake to Petersburg Access Road

Given the heightened pressure on old-growth resources within a relatively small portion of the Tongass land base, reviewers should be careful to take into account island-specific wildlife conservation concerns, particularly those south of Fredrick Sound. For example, specific standards should be developed for assuring that project level modifications to small old growth reserves provide comparable achievement of the Old-Growth Habitat LUD goals.

Recent timber sale planning efforts on Kuiu, Prince of Wales, Kupreanof and Wrangell Islands have raised concerns over the cumulative impact of more roads, habitat losses, hunting pressure, and climate change on wolves, bears, deer, and Southeast Alaskan's use of these renewable resources for subsistence, sport, and commerce.

An overview of a forest-wide wildlife strategy when nearly all the development is focused on a relatively small land base could mask serious impacts to healthy wildlife populations on individual islands. Whether it is wolves and bears on Prince of Wales Island, subsistence deer harvest on Kuiu, Wrangell and Kupreanof islands, or the uncertain impacts of climate change on species distribution and forest composition following clearcut logging, moving forward on the Tongass requires us to protect and maintain all the ecological pieces that we still have. This resiliency is particularly important given the uncertainties associated with climate change and the practice of communities using the forest around their homes as the local breadbasket.

Areas around Kake on northern Kupreanof Island and northern Kuiu Island] The areas around Kake on northern Kupreanof Island and northern Kuiu Is. have already been hit hard by timber harvest, some of it on Native Corp. land, and the remaining wild areas, important for subsistence uses, should be left alone.

When the Forest Plan was put together five years ago, I noticed that there was no mention of mariculture. One of the greatest potentials for economic development in Southeast is mariculture. Upland support is generally needed for mariculture, especially for small operators. It is almost essential for small operators to have some upland access for storage. Mariculture needs to be included in the Plan. I own a small farm up in Kake and the Forest Service charges me for an acre despite the fact that I use only 0.25 acre.

There are few opportunities for recreation in Kake other than using the roads. Other than use of the roads, there is little benefit to the people in Kake from logging in the Tongass. Companies come to Kake from Oregon or elsewhere, bringing their own fuel, groceries, and loggers. We use these roads for moose and deer hunting, and there is a Forest Service cabin that nobody can access now because you have to hike down a 30-foot gully and up the other side. It would be great to have some recreational roads in Kake.

As you look at the plan, is there room for any of the LUDs to be changed? I am specifically referring to the LUD that is designated in Petersburg Creek. I would like it to go from scenic to remote or wilderness, and I know wilderness is an act of Congress, but I'd like to see it remote without the ability for commercial use. If you cannot convert the area to a different LUD, I would like to see all of Petersburg Creek protected as a Wild and Scenic River.

In past five years, the sales that have come out of the Forest Service have been contrary to the conservation strategy to maintain viable wildlife populations. If you look at our own island since significant logging, the deer population has collapsed. There are no meaningful hunting opportunities on Mitkof Island anymore. People go out, but a lot of people don't go now because the chance of getting a deer is so slim. The same thing is happening across the Narrows on Lindenberg Peninsula, the deer population is crashing. I want to see this change. At one time, this island was the breadbasket of our community. Then when the deer population crashed the deer season was closed for 16 or 17 years. People started going to Lindenberg Peninsula to get their deer, but now most of the winter range has been deforested there and this area is in the same situation. Our subsistence opportunities have been reduced to nothing in those two areas, which were the breadbasket of our community. Something needs to change.

My real reason for being here is to request that there be no clearcutting on Mitkof Island, only have selective logging for music wood and for other very specific high quality purposes where the money can stay in the community rather than being shipped out. Let's keep the money here.

Another need that wasn't look at in earlier plans is hydro potential. There is potential conflict between hydro and other uses of those areas for a variety of needs. Reservations were made in the 30's and 40's and some things have changed since then. It is really expensive to connect some hydro power sources to the users, and have the economy of scale necessary to make them work. We think that should be looked at and the proper designations for lands created.

For example maybe Scenery Creek would be better as a Remote Recreation LUD, rather than a Scenic Viewshed. A hydro development LUD isn't appropriate there. A lot of conflict in the Petersburg community could have been avoided. This is an opportunity for all of the players to come into agreement over LUDs on the forest.

Local LUDs needs to be changed for long-term use of salmon producing streams in this community. These areas include Irish Creek, and Keku Lakes and Creek, Kushneahin Lakes and Creek, Lovelace, Totem Bay watershed, Tunehean Creek, Port Houghton, and Petersburg Creek deserve some special attention and the LUDs need to be fixed so that area is maintain for long term productivity and use of this community. These areas should be managed for salmon instead of logging.

When the plan was being revised before, Petersburg Creek was owned by Alaska Mental Health Trust (AMHT), and maybe state lands before that. It was conveyed by AMHT to the USFS and now is an opportunity to finalize that and safeguard Petersburg Creek for the long term benefit of this community and all Alaskans by designating an appropriate LUD.

Given the habitat that we are losing from logging, the old growth habitat that we've lost will never be replaced. Not only do we have habitat loss, but our last harvest of deer in Petersburg was around 180 for the season. This was a big change over 1,400-1,800 deer per year. There was supposed to be a trade off, but we are clearly well past the balance point. If you are taking one resource and tanking another – I don't know how you justify that.

Local predator-prey dynamics have changed due to logging, and the Forest Service needs to take responsibility (one commenter) Deer: Deer are particularly vulnerable when they are in pockets of timber surrounded by open areas. Wolves surround these stands and chase the deer out. The deer populations began to decline in the Petersburg area at the same time that Kupreanof was logged.

Concern Regarding Reduced Deer Population and Level of Harvest on Mitkof Island and Lindenberg Peninsula (four commenters) The deer population on Mitkof Island and Lindenberg Peninsula has declined substantially due to clearcuts. Mitkof Island was the "bread-basket" for area residents; subsistence deer and other food is significantly reduced now, and is farther away and more dangerous to harvest as a consequence. Deer require connected old growth stands for winter feeding and safety. Clearcutting on Mitkof Island and the Lindenberg Peninsula needs to be ended to bring deer populations back. Deer require connected old growth stands for winter feeding and safety. Clearcutting on Mitkof Island and the Lindenberg Peninsula needs to be ended to bring deer populations back.

[It is often said that "population trends appear stable" for management indicator species, but that is clearly not the case for deer. The deer situation is a looming disaster. Several areas, such as POW, Kupreanof/Mitkof, and Kuiu have seen severe declines in deer, and this is having cascading ecological and social impacts. Worse, the most serious problems for deer

occur when stem exclusion and hard winters coincide. As a result of past harvest and global climate change, that one--two punch is likely to become more common. Perhaps the greatest weakness of the current Forest Plan is that it provides no meaningful substantive protection for deer (at least, not as the Forest Plan is interpreted and applied). Yet, aside perhaps from salmon, deer are far and away the most important critter from a human perspective. If this review results in a substantial revision to the plan, then meaningful protection should be provided for deer. The ANILCA subsistence rules, which could be read to provide a strong protection, are in practice a technical, procedural requirement in terms of USFS habitat planning. On many timber sales we see findings that the deer population is in serious trouble, that logging is a major part of the problem that further logging will worsen the situation, and that people would use those deer and their subsistence is being restricted as a result of their absence. But without exception logging goes forward. Apparently, it is perfectly OK under the current Forest Plan to decimate deer populations in places like Prince of Wales and Lindenberg Peninsula. There is no floor. Short of an amendment, clarification should be issued establishing that, when planning timber sales, the Forest Service must actively pursue only those alternatives that would not result in subsistence harvest restrictions on deer. The fact an area is in the Timber LUD is, by itself, not enough to overcome the ANILCA restriction against impairing subsistence where it's not necessary. The wolf S&G standard of 18 deer per sq. mi. could and should be used to effectively assure adequate deer habitat for hunters' needs. There is nothing the USFS can do to conserve viable wolf populations if there aren't enough deer for human hunters, because the State would just kill the wolves and people would take whatever deer they can anyway.

In past five years, the sales that have come out of the Forest Service have been contrary to the conservation strategy to maintain viable wildlife populations. If you look at our own island since significant logging, the deer population has collapsed. There are no meaningful hunting opportunities on Mitkof Island anymore. People go out, but a lot of people don't go now because the chance of getting a deer is so slim. The same thing is happening across the Narrows on Lindenberg Peninsula, the deer population is crashing. I want to see this change. At one time, this island was the breadbasket of our community. Then when the deer population crashed the deer season was closed for 16 or 17 years. People started going to Lindenberg Peninsula to get their deer, but now most of the winter range has been deforested there and this area is in the same situation. Our subsistence opportunities have been reduced to nothing in those two areas, which were the breadbasket of our community. Something needs to change.

If we could do this, we would get the deer back. (Presents two sets horns from locally shot deer, one by his grandfather in early 1900s and one by his father in 1970.) You don't see horns like this anymore. If we had some decent habitat, and cultivated the deer population, helped them out, then we could have a guided hunting season on this island, and bring money through the town that way. Have a policy of letting the island heal itself and get the deer population back to have a viable hunting population. Bring some money in by continuing a very selective timber program. This is doable on this island; let's do it. Bring the deer back.

It is a failed subsistence responsibility by the Forest Service to assure huntable populations of deer. I can't overemphasize the importance of Lindenberg Peninsula as it relates to Mitkof Island and the ability for hunters to access deer without taking their lives in their own hands. Winter mortality works not only on deer but on deer hunters. We once had a world-class deer habitat that provided food to feed families, and this is no longer the case. We have what Dave Person (biologist) refers to as a succession debt; timber regeneration dominated by clearcutting is going to stay with us for a century or more. It doesn't matter how much of a claim that habitat is being restored there is, it will not replace the deer winter habitat, which is so crucial to providing local people with subsistence. These consequences were well demonstrated by biological opinion and they are now demonstrated as historical fact.

With regard to the 18 deer per square mile S&G, we urge the Forest Service to issue several clarifications to improve its operation. First, the S&G should be clarified to erase ambiguity as to whether the threshold can be crossed. To sustain consistency with the conservation strategy, the S&G needs to operate as a fairly hard ceiling. Projects that would push areas below the threshold should not be allowed because they are a threat to wolf viability. Areas that are already below should not be further harvested. Part of the necessary clarification is that, from a habitat perspective, wolf viability requires sustaining enough deer to support both human hunters, and wolves. This problem was made crystal clear on the Lindenberg peninsula, site of the Tonka sale. There, deer populations are in serious trouble, and subsistence deer harvest is falling far short of the need. The Forest Service has decided to continue intensively logging the area, rationalizing that wolves would find adequate habitat on nearby reserves. However, in consequence of the deer shortage, and driven by a mandate to get hunters more deer, the State of Alaska decided to pursue an aggressive predator control program, killing 80% of the wolves even in the adjacent Wilderness areas. This is exactly the kind of situation the deer density threshold is designed to avoid. Second, clarification should be issued that reserve areas do not, by themselves, compensate for reductions in deer density below the threshold. The conservation strategy is very clear on this point, though that original clarity has become muddled. To assure wolf viability, we need both reserve areas of adequate size & quality, and an adequate prey base in the matrix. Both coarse and fine filters are necessary. In our experience, whenever logging is proposed that reduces deer HSI scores below the threshold, the Forest Service rationalizes that this is not an issue because nearby reserves are adequate to sustain viability. That is inconsistent with the scientific basis of the strategy.

The Petersburg area is a perfect example of a salmon producing forest. Old growth timber isn't the most valuable commodity coming off of these lands, it's the fish. There are a number of high value watersheds on Kupreanof Island in particular that are in development LUDs right now and those LUDs should be changed to protect the salmon habitat.

There are a number of high value watersheds, on Kupreanof Island in particular, that are in development LUDs now; those LUDs should be changed to protect the salmon habitat and for long-term use of salmon producing streams in this community. This includes Irish Creek,

Keku Lakes and Creek, Kushneahin Lakes and Creek, Lovelace, Totem Bay Watershed, Tunehean Creek, Petersburg Lake and Creek, and Port Houghton.

Local predator-prey dynamics have changed due to logging, and the Forest Service needs to take responsibility (one commenter) Deer: Deer are particularly vulnerable when they are in pockets of timber surrounded by open areas. Wolves surround these stands and chase the deer out. The deer populations began to decline in the Petersburg area at the same time that Kupreanof was logged.

I strongly urge you to nix all old growth logging on sensitive and already hammered lands (central Prince of Wales Island, the Lindenberg Peninsula and Wrangell Island)! Ecosystem balance and biodiversity is vital for human health !!! Keep it wild! You work for citizens not industry! Do your job – Protect our public lands, water, wildlife, plant life, livelihoods, tourism, future and health! Your attention to this most urgent matter would be much appreciated by all present and future generations of all species! It's unique spectacular, world heritage precious wilderness – it's not a sacrifice area.

The Swan-Tyee Intertie (STI) is an example of a transmission project that, because of no road access, resulted in some very high construction costs. Use of helicopters access to construct the transmission lines resulted in a construction cost of about \$2 million dollars/mile. The STI is 57 miles long and the total construction cost including permitting, design, etc. was about \$110 million; and To provide a comparison, the proposed Kake-Petersburg transmission line, which is nearly as long and has an easement in place on which a road can be constructed, has an estimated cost of around \$45 million; and I. The cost to maintain a transmission line that is constructed without road access is also significant. The rights-of way (ROW) for such lines have to be maintained and brushed continually. The structures have to be inspected on a rotating annual basis. With road access, this work can be done by a crew in a truck. Without road access, this work has to be helicopter supported which is very expensive- approaching \$1,000/hour for a small (Hughes 500) ship; and J. In addition, transmission lines that do not have road access also have to have helicopter pads near the structures. On the STI alone, there are over 100 helipads yet to be installed at an estimated price of \$35,000/pad. This will cost approximately \$3 .5 million. These pads will have to be maintained and brushed every couple years, which also has to be done by helicopter

#### 4.79 GEOGRAPHY – PRINCE OF WALES ISLAND, CRAIG OR THORNE BAY RANGER DISTRICTS

Comments specific to Prince of Wales Island, the Craig and Thorne Bay Ranger Districts are all listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

A LUD supportive of renewable energy also recognizes the efforts of communities and school districts on Prince of Wales Island to use wood as fuel source to heat. The City of Craig and Craig City School District share the use of a wood fired boiler that heats two school buildings and the Craig Aquatic Center. Southeast Island School District burns cord wood to heat the Thorne Bay and Coffman Cove school buildings. Additionally, both Ketchikan and Sitka have wood-fired boiler systems that provide heat to public buildings, and at least one commercial building in Juneau derives its heat from wood fuel.

Aggressive Logging Has Disproportionately Impacted POW. Along with its natural lack of prey, goshawk habitat on POW and surrounding islands has also been disproportionately degraded. Initially, this area had a relatively high percentage of the highest-volume forests in Southeast Alaska. FWS 2007, p. 76. As a consequence, these forests have been disproportionately targeted by the timber industry: Timber harvest has not been evenly distributed across the Tongass NF. There are 21 biogeographic provinces within the Tongass NF (USDA Forest Service 1996a), and several have had little or no harvest (e.g., Admiralty Island and the mainland provinces). Other provinces have had substantial timber harvest activity (e.g., northeast Chichagof and Prince of Wales Islands). Iverson et al. (1996), p. 7. See also 2008 Plan FEIS, p. 3-201 (indicating that North Central Prince of Wales Island has been logged far more heavily than any other Biogeographic Province); 72 Fed. Reg. at 63131 (“Corporate lands, which cover only 3 percent of the total area of Southeast Alaska but include 7 percent of the region’s 6.4 million ac (2.6 million ha) of productive forest, are distributed throughout Southeast Alaska, with concentrations on and near Prince of Wales Island . . .”). More than 20 percent of the old growth forest of northern POW had been logged by 1995. Iverson et al. (1996), p. 74, Table 26. This percentage was almost twice as high as the next most-cutover biogeographic provinces. Id. According to Iverson et al. (1996), “[h]arvest rates exceeding 13 percent [by 1995] . . . represent[ed] increased risk to long-term goshawk persistence.” Id. (emphasis added). Just two years after this conclusion, over 33% of the productive forest on the entire island had been logged. 72 Fed. Reg. at 63137. And since then, logging has continued for another one and a half decades. As of 2006, almost 300,000 acres of old-growth forest had been logged on Alaska Native Corporation lands (which, as explained above, are concentrated on and around POW). This is about 64% of the total old growth forest originally owned by those companies. FWS, Status Report (2007), p. 129, Table A-9. Another 100,000 acres are scheduled for logging. Id. And, as noted above, additional old-growth, including high volume stands, will be logged if Sealaska acquires the lands currently covered by S. 340. This will continue to have the compounding effect of eliminating huge swaths of

goshawk habitat in the exact area (POW and surrounding islands) where the birds are already struggling the most to survive.

Although I don't live on POW, the Stoney Creek project is an example of something of which we need to see more.

An evaluation of a Tongass-wide wildlife strategy may also present too narrow a focus to meaningfully evaluate impacts to wildlife on heavily developed islands, like Prince of Wales Island – impacts from development under the disparate management regimes on private, trust, municipal/ state, and Tongass lands. Hundreds of years after the first Europeans intruded on Southeast Alaska, Prince of Wales Island resembles an over-appropriated river, like the Colorado River. Its ecological productivity has served as a magnet to development interests – everybody wants a piece of it. These conflicting resource demands on the same geographic base have resulted in the overall degradation of those characteristics that make Prince of Wales Island a special place.

At present, rural southeast Alaskan communities are suffering from high levels of poverty and 15% average unemployment, due to federal restrictions placed on how the Tongass can be used. There are many economic opportunities available within the Tongass which can be developed and managed in a responsible manner with minimal environmental impacts, which are currently inaccessible. Examples include potential mining projects on Prince of Wales Island, as well as economic timber sales. Please assure that the Tongass is managed in a way that provides communities in southeast Alaska with equitable opportunities for quality employment and economic growth.

Confusion exists over the delineation of Recreation and Scenic River Land Use Designations on the Thorne River Hatchery Creek proposed Wild and Scenic River Corridor. This comment seeks clarity about where the river is designated scenic and where it is designated recreation. Clear language and a map in the revised plan would facilitate better management of the lands around this river corridor.

Goshawks Maintain Larger Territories and Experience Lower Productivity on POW than Anywhere Else in Southeast Alaska. On POW and nearby islands, goshawk territories tend to be larger, and nesting productivity lower, than anywhere else in the region. This is true, in part, because prey abundance and diversity is low: In areas with low abundance and diversity of prey, such as Prince of Wales (which lacks red squirrels, suitable alternative mammalian prey, and sooty grouse) . . . we expect wider territory spacing (i.e., lower breeding-pair densities) than in areas with greater abundance, diversity, and availability of prey. We also expect less stability in goshawk nest activity (numbers of pairs attempting to nest) where prey diversity is low, as opportunities to compensate for temporal fluctuations in prey populations by switching to alternate prey are limited. FWS, Status Report (2007), p. 41. For a number of reasons, loss of habitat also affects goshawk densities (i.e., territory sizes) and productivity: Several factors may contribute to decreased productivity and density in goshawk populations

following particular changes in forest structure and composition: (1) increased predation on adults and young goshawks as hiding cover is reduced and potential predator populations increase (e.g., great horned owls); (2) loss of cool thermal conditions at nest sites; (3) reduced prey abundance or availability, or both; (4) increased competition as predators that adapt to more open forest become abundant; and (5) increased disturbance and human-caused mortality due to increased access from the timber harvest road network. Iverson (1996), p. 21. For these reasons, goshawk territories on POW are larger than any recorded elsewhere in Southeast Alaska (where territories are already larger than in other parts of the goshawk's range). Iverson et al. (1996), p. 68.

Goshawks on Prince of Wales Island (POW) and surrounding islands—which FWS has determined constitutes a significant portion of the Southeast Alaska goshawk range—are especially at risk, due to low prey abundance, disproportionate habitat destruction, huge territories, and low nest productivity. These circumstances render goshawks in this area particularly susceptible to continued logging. As FWS has explained: Threats to the Queen Charlotte goshawk in Southeast Alaska are greatest on Prince of Wales Island and the surrounding smaller islands at the southern end of the DPS. Timber harvest on both the Tongass National Forest and native corporation lands has been intensive in some parts of this area. Approximately 26 percent of the productive forest on Prince of Wales and the surrounding islands has been harvested, including some of the most productive forest lands in Southeast Alaska (Albert and Schoen 2006, pp. 15-18). Key prey (especially red squirrels and sooty grouse) are naturally lacking, resulting in comparatively low goshawk nesting densities and lower reproductive success than elsewhere in the DPS (USFWS 2007, pp. 39-42 and pp. 74-78). 72 Fed. Reg. at 63136-37. Yet, despite these threats, additional, widespread cutting of goshawk habitat is scheduled to occur on these islands. See FWS Appendices (2010), Table A-9. For these reasons, goshawks on POW and surrounding islands are at risk of becoming threatened or endangered, or disappearing from these islands altogether.

Highgrading has been most pronounced on Prince of Wales Island. Albert and Schoen found that “The largest proportion (31%) of contiguous high-volume forest occurred on northern Prince of Wales Island, where such forests have been reduced by 93.8% and average patch size declined from 264 ha in 1954 to 73 ha in 2004.”

How does Viking Lumber on Prince of Wales Island fit into the Forest Plan? Is there enough wood on the Island to sustain Viking Lumber for ten years? After this contract is up will the Forest Service be looking to young growth? I am curious because we lease land to Viking, and are in a negotiations process. I am not saying that Viking Lumber should be cut off, but I grew up here and I was in awe one day when I walked up from the beach and saw how much logging had occurred in the area of El Capitan.

I am deeply concerned by the negative impacts the current Tongass Land Management Plan (TLMP) is having on rural communities in southeast Alaska, and am writing to request that you amend the plan in the following ways:] At present, rural southeast Alaskan communities

are suffering from high levels of poverty and 15% average unemployment, due to federal restrictions placed on how the Tongass can be used. There are many economic opportunities available within the Tongass which can be developed and managed in a responsible manner with minimal environmental impacts, which are currently inaccessible. Examples include potential mining projects on Prince of Wales Island, as well as economic timber sales. Please assure that the Tongass is managed in a way that provides communities in southeast Alaska with equitable opportunities for quality employment and economic growth.

I am writing this letter in concerns with our Timber industry, here on Prince of Wales Island. I feel that restrictions on our Forest Lands here would have astronomical effects to our community. Without it, hundreds of jobs will be lost, not only in the logging aspect of it. But, also as an employee of AP&T. The Saw mill uses half of AP&T's power and a shutdown would mean layoff's for AP&T and that those of the rest of the local businesses. I would like to see our economy grow bigger not get smaller. It's already tough to make a living here for some. Do not make it tougher for all. More restrictions on Forest Lands, means less job opportunities for residents of Prince of Wales. Help keep Alaskan's working by opening up more timber sales, and mining.

I have been fortunate to travel in area of Tongass and I hope that the remaining forest will be still available when my great great grandchildren are able to visit that area. When you view the destruction of clear cutting on Prince of Wales Island it breaks your heart. There should be a balance to leave as much of the forests and particularly old forest growth. It is a delicate task to provide jobs and protect this beloved forest and I am confident that wise heads will see the wisdom in controlling the corporations that seek to decimate the old growth for their own profit.

I overheard a conversation regarding tree girdling in the area of 12 mile and Upper Stoney Creek area. The individuals intended to return to the area the following year and collect the girdled trees as firewood.

I strongly encourage the Forest Service not to target old growth logging on sensitive and already hammered lands such as Prince of Wales Island, the Lindenberg Peninsula and Wrangell Island. We do a terrible disservice to future generations by logging what little remains of the earth's old growth forest. There is no legitimate domestic need for such logging in the magnificent Tongass National Forest.

I strongly urge you to nix all old growth logging on sensitive and already hammered lands (central Prince of Wales Island, the Lindenberg Peninsula and Wrangell Island)! Ecosystem balance and biodiversity is vital for human health !!! Keep it wild! You work for citizens not industry! Do your job – Protect our public lands, water, wildlife, plant life, livelihoods, tourism, future and health! Your attention to this most urgent matter would be much appreciated by all present and future generations of all species! It's unique spectacular, world heritage precious wilderness – it's not a sacrifice area.

I would like to emphasize the need to promote economic development in the Tongass by supporting the mining community. Mining has a potential to employ thousands of people in the near future. Kensington Mine and Greens Creek Mine provide good jobs with benefits to locale residents of Juneau. Mining activity on Prince of Wales has the same potential.

I would like to see the Forest Service timber sales to continue and also would like to see mining to be able to continue especially on Prince of Wales Island

It is often said that “population trends appear stable” for management indicator species, but that is clearly not the case for deer. The deer situation is a looming disaster. Several areas, such as POW, Kupreanof/Mitkof, and Kuiu have seen severe declines in deer, and this is having cascading ecological and social impacts. Worse, the most serious problems for deer occur when stem exclusion and hard winters coincide. As a result of past harvest and global climate change, that one--two punch is likely to become more common. Perhaps the greatest weakness of the current Forest Plan is that it provides no meaningful substantive protection for deer (at least, not as the Forest Plan is interpreted and applied). Yet, aside perhaps from salmon, deer are far and away the most important critter from a human perspective. If this review results in a substantial revision to the plan, then meaningful protection should be provided for deer. The ANILCA subsistence rules, which could be read to provide a strong protection, are in practice a technical, procedural requirement in terms of USFS habitat planning. On many timber sales we see findings that the deer population is in serious trouble, that logging is a major part of the problem that further logging will worsen the situation, and that people would use those deer and their subsistence is being restricted as a result of their absence. But without exception logging goes forward. Apparently, it is perfectly OK under the current Forest Plan to decimate deer populations in places like Prince of Wales and Lindenberg Peninsula. There is no floor. Short of an amendment, clarification should be issued establishing that, when planning timber sales, the Forest Service must actively pursue only those alternatives that would not result in subsistence harvest restrictions on deer. The fact an area is in the Timber LUD is, by itself, not enough to overcome the ANILCA restriction against impairing subsistence where it’s not necessary. The wolf S&G standard of 18 deer per sq. mi. could and should be used to effectively assure adequate deer habitat for hunters’ needs. There is nothing the USFS can do to conserve viable wolf populations if there aren’t enough deer for human hunters, because the State would just kill the wolves and people would take whatever deer they can anyway.

Mining and Mineral Exploration. The Minerals Overly LUD applied to the Niblack, Bokan Mountain, and Cholmondeley Sound areas benefits the mining sector and should be retained in TLMP.

Mining and Mineral Exploration. There is broad interest on POW Island in developing road access to the mine prospects at Niblack and Bokan Mountain. Proponents of a road to the mines see long-term benefits to island residents from overland access. The access would also benefit the mine prospects by easing delivery of goods and services to the sites. Senator Murkowski and Senator Begich, and Congressman Young, in recognition of the level of support on POW for road access, sponsored legislation that initiates the process that may ultimately lead to construction of a road from the existing POW Island road system to the Niblack and Bokan Mountain projects. Road access provides not only for the efficient delivery of goods and services to the mine prospects, but also provides for efficient transmission of hydro-generated electricity, and the cost-effective operation and maintenance of a transmission line.

Moreover, neither the 2001 Roadless Rule nor the 2008 Amended Forest Plan considered or analyzed the adverse economic costs, or the opportunity for jobs related to the development of renewable energy resources, to rural Southeast Alaska communities, or the direct economic impact on Southeast Alaska residents caused by their inability to access and develop mines and renewable energy resources in rural Southeast Alaska; and The 2001 Roadless Rule prohibits communities such as Craig and Klawock from accessing mines with a road on Prince of Wales Island, thereby denying access to jobs to the residents of those communities and a local workforce to Prince of Wales' mines, such as Niblack and Bokan Mountain; and KINC and its shareholders will be harmed by their inability to obtain the access necessary to prospect, explore for and develop new mines in IRAs, by their inability to cut the trees within IRAs necessary to allow the substantial exploration needed to develop a mine and the construction associated with mine development; and by their inability to access renewable energy resources to provide non-carbon power to mines.

Neither the 2001 Roadless Rule nor the 2008 Amended Forest Plan considered or analyzed the adverse economic costs, or the opportunity for jobs related to the development of renewable energy resources, to rural Southeast Alaska communities, or the direct economic impact on Southeast Alaska residents caused by their inability to access and develop mines and renewable energy resources in rural Southeast Alaska; and The 2001 Roadless Rule prohibits communities such as Craig and Klawock from accessing mines with a road on Prince of Wales Island, thereby denying access to jobs to the residents of those communities and a local workforce to Prince of Wales' mines, such as Niblack and Bokan Mountain; and ANB members will be harmed by their inability to access renewable energy resources to provide non-carbon power to their communities, businesses and mines that create employment within the TNF.

One way to help achieve lower rates for rural residents is application of a Renewable Energy Development LUD/LUD Overlay. Doing so supports development of renewable energy, and associated transmission lines within the Tongass National Forest. The proposed LUD would build on efforts to increase the amount of hydroelectric generation and transmission in the region, a goal supported by a wide segment of those living in the Tongass. In addition, the new LUD could support timber industry efforts to enter into biomass fuel markets as a component

of the process of logging and milling Tongass wood. A LUD supportive of renewable energy also recognizes the efforts of communities and school districts on Prince of Wales Island to use wood as fuel source to heat. The City of Craig and Craig City School District share the use of a wood fired boiler that heats two school buildings and the Craig Aquatic Center. Southeast Island School District burns cord wood to heat the Thorne Bay and Coffman Cove school buildings. Additionally, both Ketchikan and Sitka have wood-fired boiler systems that provide heat to public buildings, and at least one commercial building in Juneau derives its heat from wood fuel.

Please continue with the restoration projects such as the ones on POW. It does stick in my craw a bit that some of the same people that made the mess are being paid to clean it up (FUBAR for example)

Prince of Wales Island Lacks important Prey Species. For a number of reasons, goshawks on POW are more stressed, more sensitive, and more vulnerable to continued logging of old-growth forest than goshawks anywhere else in Southeast Alaska. First, POW and surrounding islands naturally lack key prey. Red squirrels, which are important prey items for goshawks elsewhere in Southeast Alaska, are absent. Iverson (1996), p.59; FWS, Status Report (2007), p. 39; The Shipley Group, Soule River Survey (2009), p. 19. There is a species of flying squirrel in the area, but it is nocturnal, and essentially unavailable to goshawks. FWS, Status Report (2007), p. 39. Mammalian prey is so scarce on POW and surrounding islands that one study documented “99 percent of the biomass delivered [to nests] was avian, as compared to northern Southeast Alaska, where mammals accounted for 26 percent of prey biomass.” Id. at 39. This becomes a particularly serious problem in the winter, when “many avian prey species migrate from the region, [further] reducing the variety and abundance of prey available.” Id. at 6. POW and the surrounding islands also lack sooty (blue) grouse, another key food source for goshawks elsewhere in Southeast Alaska. Iverson et al. (1996), p. 59; FWS, Status Report (2007), p. 39. Although spruce grouse inhabit the area, they are only about half the size of sooty grouse. FWS, Status Report (2007), p. 39. Further, logging has reduced the availability of spruce grouse to goshawks, because: 1) spruce grouse avoid clearcuts; and 2) although spruce grouse can inhabit 15- to 35-year-old second growth (Id. at 63), goshawks cannot forage in such young stands because of the density of the tree stems, which “interfere with flight lines and decrease hunting success.” Id. at 36. As a result, “[r]esearchers have identified food stress as a limitation for goshawks on Prince of Wales Island and surrounding islands in southern Southeast Alaska . . . .” 72 Fed. Reg. at 63136. For example, “[m]ost females that died [of starvation] during Flatten et al.’s (2002) study were from the Prince of Wales area, which lacks red squirrels, hares and sooty grouse to support goshawks during winter (Titus et al. 2002).” FWS, Status Report (2007), p. 41.

Restoration Projects. While some restoration projects now occurring on POW enjoy local support, the efforts underway at Staney Creek, Harris River, and other sites appear to target the drainages that show the greatest need. However, very few of the approximately 1,200 watersheds on the Tongass show need for in-stream restoration. There is a risk of overstating

the need for and benefits from restoration projects after completion of the projects now underway. It is likely that future projects will provide ever diminishing returns on funds spent on stream systems that have marginal or negligible need for restoration.

The 2001 Roadless Rule prohibits communities such as Craig and Klawock from accessing mines with a road on Prince of Wales Island, thereby denying access to jobs to the residents of those communities and a local workforce to Prince of Wales' mine projects, such as Niblack and Bokan Mountain.

The 2001 Roadless Rule prohibits communities such as Craig and Klawock from accessing mines with a road on Prince of Wales Island, thereby denying access to jobs to the residents of those communities and a local workforce to Prince of Wales' mine projects, such as Niblack and Bokan Mountain.

The areas around Point Baker and Port Protection on northern Prince of Wales Is. have already been hit and should not be classified for more timber harvest.

The following publications have been published since the 2008 review. I include comments with each to provide insights regarding the implications for the conservation strategy. I include two earlier publications that are relevant to the current review of the conservation strategy. 1. Smith, W. P., and P. A. Zollner. 2005. Sustainable management of wildlife habitat and risk of extinction. *Biological Conservation* 125:287-295. In this publication Smith and Zollner point out that assessment of wildlife viability during the selection of the preferred alternative substantially underestimated the risk to viability across the planning area so the conservation strategy may not adequately provide for maintaining viable and widely distributed populations of ALL indigenous vertebrates. The procedure used to assess wildlife viability examined the risk to viability to each of the focal species (goshawk, wolf, etc.). The appropriate question is "what is the risk of viability of ANY species?" The consequence of this illustrated in the following example. Let say goshawks had a likelihood score of 0.80 of viability with the preferred alternative; wolves had a score of 0.70, marten 0.80, and brown bears 0.70. The Forest Plan assessment regarded the preferred alternative of having the highest risk to wildlife viability with brown bears or marten and that the scores were relatively high. However, the likelihood of ALL wildlife being viable is the product of ALL the species evaluated:  $0.8 \times 0.8 \times 0.7 \times 0.7$ , or 0.32, which is twice the risk of wildlife viability across the planning area than what was concluded from the panel assessments. This issue becomes even more significant when one realizes that most of the proposed forest management is in the POW biogeographic province, which has the most biological and evolutionary diversity among provinces in southeast Alaska (Smith, W. P. 2005. Evolutionary diversity and ecology of endemic small mammals of southeastern Alaska with implications for land management planning. *Landscape and Urban Planning* 72:135-155.).

The following publications have been published since the 2008 review. I include comments with each to provide insights regarding the implications for the conservation strategy. I

include two earlier publications that are relevant to the current review of the conservation strategy. 6. Flaherty, E. A., M. Ben-David, and W. P. Smith. 2010. Diet and food availability of the endemic Prince of Wales flying squirrel (*Glaucomys sabrinus griseifrons*) in Southeast Alaska: implications for dispersal across managed landscapes. *Journal of Mammalogy* 91:79-91. This paper examined the question of whether there would be sufficient food resources in managed habitats to provision dispersing flying squirrels to mitigate the additional time and energy needed to traverse managed landscapes. The findings of this study revealed that recent clearcuts and second growth have significantly less food resources typically found in the diet of flying squirrels in southeast Alaska and thus squirrels that attempt to disperse through managed landscapes would likely experience greater challenges to survive.

The following publications have been published since the 2008 review. I include comments with each to provide insights regarding the implications for the conservation strategy. I include two earlier publications that are relevant to the current review of the conservation strategy. 9. Smith, W. P. 2012. Flying squirrel demography varies between island communities with and without red squirrels. *Northwest Science* 86:27-38. This paper examined the question of whether red squirrels influence flying squirrel populations. Population density and survival were lower and demographic variability of flying squirrels was greater on Mitkof Island where flying squirrels occur with red squirrels as compared to POW where red squirrels are absent. These findings have several implications for the conservation strategy: 1) ecological communities across the Tongass vary in composition, which can have implications for population dynamics of focal species and thus it is unwise to extrapolate findings from one region of the Tongass (especially an island) across the entire planning area, and 2) the previous cited paper by Smith and Person (2007) revealed that demographic variability, not total population size, had a much greater effect on the probability of persistence of flying squirrels in OGRs. Thus, everything else being equal, the probability of flying squirrels persisting in OGRs on Mitkof Island likely is less than on POW, and will vary among ecological communities across the planning area.

The Forest Service earlier this year opposed legislative efforts to permit a road through an IRA to reach either the Niblack or Bokan Mountain gold/Rare Earth Element mines proposed on the southeast side of Prince of Wales Island. Such a road will be vital for residents of Craig, Klawock and those who live on the island's road system to be able to commute on a daily basis to jobs at the mine, without first having to reach Ketchikan to be transported back to the mines by watercraft. The Forest Service opposition to surface access to the mines also comes in light of the Federal District Court in its 2011 decision re-imposing the roadless rule specifically exempting the Bokan Mountain Exploration Plan, the Niblack Mine exploration plan, and the Greens Creek mine geotechnical and tailing expansion plans from coming under the rule.

The Goshawk Population in Southeast Alaska Is Largely Isolated. Goshawks in Southeast Alaska are particularly vulnerable because of their relative isolation. As FWS has explained, "Isolated populations are typically at greater risk of extinction or genetic problems such as inbreeding depression, hybridization, and loss of genetic diversity, particularly where

populations are small.” 72 Fed. Reg. 63123, 63125 (Nov. 8, 2007). As discussed below, the Southeast Goshawk population was, even a decade ago, relatively small, with perhaps only 200-300 breeding pairs. FWS has also determined that the population is largely isolated, because it appears to be cut off from both the Queen Charlotte Islands to the south, and the British Columbia mainland to the east. See 72 Fed. Reg. at 63125 (“[T]here has apparently been little or no recent genetic interchange between Southeast Alaska and the Queen Charlotte Islands to the south (Gust et al. 2003, p. 22; Talbot et al. 2005, p. 2-3, Robus 2006, p. 2; USFWS 2007, pp. 117-118)”). See also FWS, Status Report (2007), p. 60 “The Queen Charlotte goshawk (*A. g. laingi*) is potentially separated from *A. g. atricapillus* [the continental subspecies] by the Coast Range mountains, a barrier of high, glaciated peaks along the mainland with habitat unsuitable for occupancy by goshawks”).

The USFWS has determined that POW and the surrounding islands constitute a significant portion of the range of Southeast Alaska goshawks. POW and nearby islands contain about 22 percent of the productive forest habitat across the entire Southeast Alaska DPS, and support about one fifth of the DPS’s goshawk population. 72 Fed. Reg. at 63137. POW goshawks also exhibit important genetic characteristics: Goshawks from this area tend to be smaller than those from the northern portion of the DPS (Titus et al. 1994, pp. 10-12), suggesting a possible adaptation to a prey-poor environment, perhaps providing important genetic representation.” Id. For these reasons, FWS determined that these islands constitute a significant portion of Southeast Alaska goshawks’ range. 72 Fed. Reg. p. 20.

There have been changes regarding what we know about science. We know that global warming and climate change are affecting the forest, but we do not yet know how exactly. We are getting new information about local species on the Prince of Wales Island, especially wolves and deer; such as the fawn mortality study that is currently under way. The Forest Plan should reflect the best available science and that requires changes to the Plan.

There is insufficient young growth to support either the existing mill at Klawock or any other mills that might be built to add timber jobs here on POW and elsewhere in the Tongass. Based on the report cited in this paragraph, most of the forest’s young growth stands will not be ready for economic harvest for another 40-50 years. Therefore, sustaining the existing industry and meeting the 267 MMBF allowable sale quantity in the existing Forest Plan necessitates including sufficient old growth in USFS timber sales until young growth stands alone can meet market demand and are ready for harvest. Doing so provides local mills with wood needed to continue their operations, and time retool for young growth wood.

There is insufficient young growth to support either the existing mill at Klawock or any other mills that might be built to add timber jobs here on POW and elsewhere in the Tongass. Based on the report cited in this paragraph, most of the forest’s young growth stands will not be ready for economic harvest for another 40-50 years. Therefore, sustaining the existing industry and meeting the allowable sale quantity in the existing Forest Plan necessitates including sufficient old growth in USFS timber sales until young growth stands alone can meet market

demand and are ready for harvest. Doing so provides local mills with wood needed to continue their operations, and time retool for young growth wood.

Timber. POW has one medium sized mill and a number of smaller mills on the island. Many of the people employed at these mills and those that harvest timber for the mills have families and live here year round. The multilayered benefit of these jobs contributes to nearly every school, business and community on POW. It should also be noted that some of these mills are actively pursuing new opportunities with young growth timber and in wood fuels to reduce dependence on old growth and fossil fuels. In addition, several of these mills produce important, high-value wood products from old growth such as wood for guitars and pianos – such wood cannot be found in many other places in the world and is therefore a unique and valuable asset for our local businesses. Together this variety of milling and wood-based businesses is critical to a diversified economy.

We are summer time residents of Tongass National Forest and are concerned about some of the TLMP. We don't like the Tongass being managed to allow an unsustainable amount of logging. We don't like the plans to cut every last bit of old-growth forest on Wrangell Island to support an export industry; we don't like the continuing cutting of sensitive already cut lands in central Prince of Wales Island and the Lindenberg Peninsula.

We have a shellfish farm that is located in Tokeen Bay in Southeast (Tongass). We have suspended culture and intertidal. We will most likely desire some type of use on adjacent uplands in the near future. Please consider shellfish farming as a recognized LUD.

We need our area to be able to provide jobs for the citizens of POW Island... instead of watching all of our children leave to other areas for lack of work... 3 of my 4 children have left the island... jobs , timber, and new mining ventures are what is needed to help our area... to be self-sufficient... not losing jobs which just costs the government money...i.e. unemployment, food stamps welfare... jobs are what we need... not special interest groups from far away from our area saying don't promote business to employee Alaskans... most of these people will never come to Alaska to see ...let us continue to create jobs and protect our environment.. we live here we love the land and will take care of it while working and protecting our Tongass we just need a chance to work

Wrangell has so little old growth left we can't afford to deplete what we have. Rather than promote a 1950s style of timber harvest we should concentrate on promoting a sustainable and diverse economy in Southeast Alaska. Mega-cuts on Prince of Wales will be destroying small business operations.

#### 4.80 GEOGRAPHY – SITKA RANGER DISTRICT

Comments specific to the Sitka Ranger District are listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

<p>The Tongass Timber Reform Act provided protection for two watersheds in Tenakee Inlet, Kadashan and Trap Bay. However the original bill, passed by the House of Representatives, gave the same level of protection to the watersheds of upper Tenakee, and reflected decades of public support for their protection. I strongly urge that any future Forest Plan revision commit to watershed-scale protection of Saltery Bay, Seal Bay, Long Bay, Goose Flats, and the head of Tenakee Inlet.</p>
<p>The Tongass National Forest and specifically my local Sitka Ranger District has made significant strides in improving management of our National Forest. My hope is that the USFS takes this opportunity to refine the Forest Plan to continue that improvement. The current Forest Plan is a failure in that it overemphasizes timber harvest at the expense of other, more sustainable, more economically successful, and more community-building activities. Timber is such a small fraction of the activities that the USFS is charged with managing, and timber is a tiny fraction of the current and even potential economic activities in the region. Fishing, tourism, and subsistence are far more important to the communities of Southeast Alaska and to the nation at large than timber.</p>
<p>WHEREAS, in order to reduce the consumption of high cost fossil fuels for the benefit of human health, economic development, the environment and national security, communities in Southeast Alaska must have access to renewable energy opportunities within the Tongass; and WHEREAS, development of renewable energy resources within the Tongass, such as hydroelectricity from Blue Lake, Takatz Lake, and other alpine lakes requires access that include utility corridors; and WHEREAS, development of additional renewable energy resources within the Tongass, such as woody bio-mass fuels and geothermal, requires access that includes utility corridors and the ability to harvest timber.</p>
<p>WHEREAS, limited access to quarry rock has added to the high cost of housing, commercial and public construction projects in Sitka while rock resources exist within the Tongass that are ready to be developed, such as the Katlian Bay Rock Quarry owned by Sealaska and Shee Atika Native Corporations.</p>

Land Use Designations: We request the following areas, in their entirety, be reallocated to non-development land use designations. \* Peril Strait areas: Ushk Bay, Rodman Bay, Saook Bay, Deep Bay, Fish Bay \* Cleveland Peninsula \* North Kuiu - Saginaw and Security Bay \* Lake Eva and Kelp Bay \* Sitkoh Bay and Sitkoh Lake \* Port Houghton and Windham Bay The areas listed above, with the exception of Kelp Bay, are areas for which we have received authorization to operate and would like to see the primary focus shifted away from intensive development to recreation or a status more compatible with meeting similar objectives. We have requested use in Kelp Bay and because of capacity limits have not been authorized service days for the area. UCA will continue to seek authorized use of this area and looks forward to working with the Sitka Ranger District on the potential to include this in our annual operation plans.

Additionally, for areas where the landscape is already modified we support restoration and other enhancement activity that would be beneficial to commercial recreation activity. For example, UCA has been encouraged to use Hanus Bay to disperse the use for the Lake Eva Trail where our authorized service days have declined due to increased demand and capacity. However, this area and particularly the Large Group Area site within it have been roaded and logged in the past. Our objective to provide guests with a wilderness quality experience of the Tongass cannot be met by such areas. If however, the site was restored to natural characteristics and the road redeveloped to a recreational trail, then it could potentially meet our needs.

Another example is in Sitkoh Bay where we are authorized to use the Sitkoh Bay Forest Service Road and for similar reasons to Hanus Bay our use is minimal. Additionally, in Sitkoh Bay we are precluded from using the Sitkoh Lake Trail due to poor condition. These are just a couple the many examples where changes in land use and project planning would better serve commercial recreation interests and needs.

UCA requests a change to Standards and Guidelines related to the Recreation Opportunity Spectrum (ROS). Currently, commercial groups are limited to no more than 2 groups of 12 per day in areas classified as Primitive (TLRMP, Appendix I). With vast landscapes classified as Primitive (i.e., all of South Baranof including non-Wilderness LUDs), UCA believes this S/G is more restrictive than necessary to maintain the integrity of the landscape and recreation setting. As an alternative to increasing group size and per day limits for the Primitive ROS, we would request that Forest Service consider reclassifying Non-Wilderness Primitive areas to Semi-Primitive non-motorized.

The Transportation and Utility System (TUS) corridor across Baranof Island to Takatz Lake that is depicted in the Forest Plan is a general approximation only and now that more specific options/routes are being developed, is not in the 'right' place. Given that these TUS were general only, the application of the TUS should be considered approximate. However the TNF and the Federal Energy Regulatory Commission (FERC) are not interpreting it this way and this has eliminated possible environmentally and economically preferable alternatives

from consideration. During feasibility work on the City and Borough of Sitka (CBS) Takatz Lake Hydroelectric Project, they were unable to consider alternative corridors across Baranof Island that may have been more economically viable and better suited for the landscape because the TUS isn't in the exact right spot in the Forest Plan. The alternative corridor would pass through a Remote Recreation LUD which doesn't allow electric transmission lines unless there is a TUS overlay. The Sitka Ranger District notes they have been working with the CBS on this issue, and recommends submitting a comment on this matter and needed Forest Plan changes.

The current plan has a conservation strategy that utilizes old growth reserves and conservation areas. This works in some places and may not work in others. One place that does work is Fish Bay. Although Fish Bay was logged in a very irresponsible manner from ridge-top-to-ridge-top with a salmon river being used as a road corridor for log removal, it is still valuable habitat because it is a very productive watershed and is hugely important for fish, bears, deer, and public use. However, other places that are old growth reserves seem to be set in place to avoid old growth habitat (to allow for high-grade logging) or avoid the most important deer winter habitat to make these areas and trees available for logging. We object to that and would cite that this specifically negates the purpose of the old growth reserves.

We like the designation of the central part of Kruzof Island as a modified landscape and support management activities here that bring together wild life conservation, salmon production, timber production for supplying local community needs, recreational uses, etc.

We do not support the designation of Ushk Bay/Poison Cove area as a timber production LUD. This area was part of the original SCS Wilderness Proposal from 1967 and this area should be included in the larger West Chichagof Wilderness Area.

Our forest management regime can be much more dynamic; that is what I practice and do professionally. It is simply untrue that clearcutting does not provide food for deer and bear. I was recently speaking to the ADF&G Wildlife Division regarding bears on Chichagof Island. The highest concentration of bears there is by the West Fork River because that area is in an early stage of regrowth so that is where more food is located.

Upper Kelp Bay on northeast Baranof Is. should be left alone but is classified for "timber." A little further south on Baranof island, I am disturbed to see the "road corridor" and "potential power transmission line" running through Baranof Warm Springs and Baranof Lake area. This corridor is a source of great controversy because it is through an extremely scenic area that experiences very high recreational visitation. Pushing either a road or a transmission corridor through here would be at once extremely expensive and destructive. Mountain tunnels, difficult to build and expensive to maintain, would be necessary. The extensive hot springs at Baranof Warm Springs would be threatened by blasting.

#### 4.81 GEOGRAPHY – WRANGELL RANGER DISTRICT

Comments specific to the Wrangell Ranger District are listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

<p>I am against continuing previous logging practices under TLMP. On Wrangell island an effort is underway to build a sustainable industry with small mills, Jim Colliers and Mike Allen's among them, and a buildup in the harvesting of music wood. Our old growth needs protection as a rare intact ecosystem, as does all old growth in the Tongass.</p>
<p>I've seen firsthand what old style logging is like. The State Mental Health Trust has cut on Wrangell Is. and left a large footprint by not following conservation practices. Ultimately only a few logs were taken, all the slash was left as an eyesore, and no forethought went into wind shear of trees on neighboring property, or that the wood cut on steep hillsides will come down on the highway below. This is logging at its worst. The point is, we do not need to promote cuts with poor value, but follow a plan that conserves and is sustainable for our economies.</p>
<p>We are summer time residents of Tongass National Forest and are concerned about some of the TLMP. We don't like the Tongass being managed to allow an unsustainable amount of logging. We don't like the plans to cut every last bit of old-growth forest on Wrangell Island to support an export industry; we don't like the continuing cutting if sensitive already cut lands in central Prince of Wales Island and the Lindenberg Peninsula.</p>
<p>The 77 watersheds listed in the proposed Trout Unlimited bill should be protected. Most important to me is Thoms place watershed.</p>
<p>Wrangell Island needs a cumulative impact study to look at all the timber sales that have been done piecemeal over the years</p>
<p>On top of the watered--down matrix protections, cause for concern is the concentration of logging in a few particular biogeographic provinces, as impressively illustrated by Dave Albert's June, 2013 presentation. North Prince of Wales, Kupreanof/ Mitkof Islands, and Etolin are of particular concern. One problem with the increasingly concentrated harvest areas is lack of tracking of wildlife corridors, which are essential to maintain connectivity between reserve 1 areas and different habitats (e.g. upper and lower elevations). Timber sales are designed leaving small strips of remaining forest, which are expected to sustain connectivity. But then some years later the Forest Service returns and cuts those leave strips, without being able to consider or reconsider the assumptions of the earlier NEPA analysis. The initial assumption of the conservation strategy was that such leave strips would provide species mobility between OGRs. That assumption may not hold up if timber harvest is concentrated.</p>

[The State of Alaska] recommends that the USFS consider amending the Transportation and Utility System LUD to emphasize the development and maintenance of roads and utilities for multiple uses on the TNF rather than limiting the application of the LUD to "major systems." In Section 1113 of ANILCA, Congress found that there was a need to study the effect of ANILCA on the ability of the Government of Canada to obtain access in the Stikine River region of southeast Alaska. The resulting report to Congress (USDA, 1987) acknowledged that the Government of Canada was guaranteed navigation privileges on the Stikine River by treaty provisions that predate the passage of ANILCA. While no immediate surface access demands for the Stikine River region were identified at the time of the study, the report concluded that when surface access is needed through this region the most economic and feasible alternative may be to cross some portion of the Stikine-LeConte Wilderness Area. Therefore, the report proposes a process to analyze and develop appropriate recommendations at such time as access in the Stikine River region is actually requested by the Government of Canada. The State recommends that the Transportation and Utility System LUD of the Forest Plan recognize Canada's navigational rights on the Stikine River and reference the process by which Canada may request surface access through the Stikine River region in the Wilderness LUD, pursuant to Section 1113 of ANILCA and the Stikine River Region Access Study (1987).

In Wrangell, all of the roads are classified as "Visual Priority" routes. Our question is how and why they were designated as such and are they really all "Visual Priorities." Does the plan allow flexibility for adjusting the designation at the local level during a project review or is the criteria for a visual priority route so strenuous (or lax) that all roads meet the requirements, thereby eliminating other opportunities?

The Stikine River is under threat from the Red Chris mine. Because the Canadian government has eliminated many regulatory agencies, massive projects such as the KSM or Red Chris could sail through the permitting process. When this project ends in 52 years, Alaskans will have to deal with long-term degradation of the environment. The Tulsequah Chief mine on the Taku shows how Canadians mining companies take care of abandoned mine sites - they ignore them because there is no revenue from the mine. Do we allow anyone to pollute our rivers?

I strongly urge you to nix all old growth logging on sensitive and already hammered lands (central Prince of Wales Island, the Lindenberg Peninsula and Wrangell Island)! Ecosystem balance and biodiversity is vital for human health !!! Keep it wild! You work for citizens not industry! Do your job – Protect our public lands, water, wildlife, plant life, livelihoods, tourism, future and health! Your attention to this most urgent matter would be much appreciated by all present and future generations of all species! It's unique spectacular, world heritage precious wilderness – it's not a sacrifice area.

There have been previous studies exploring the economic opportunity associated with an interconnection of the current or expanded electric transmission system in Southeast Alaska by a relatively short transmission line up the Bradfield Canal. This would connect with the electrical grid managed by the WECC now serving western North America. This proposed interconnection would no doubt go through Remote Recreation LUDs and Inventoried Roadless Areas. The impact of this interconnection would allow Alaskans to develop the significant renewable energy resources available in Southeast Alaska because it would expand the market for these renewable energy resources by orders of magnitude. It would also provide other benefits by allowing the import of energy and capacity in times of shortage from sources widely dispersed and located throughout western North America. The electrical interconnection would also have other system benefits as far as voltage and system stability. The 2008 Amended Forest Plan needs to be completely redone to consider these possibilities.

The 2008 Forest Plan also failed to take into account legislation that Congress approved on November 13, 2000 (P.L. 106-511) that authorized federal funding for the then proposed Southeast Alaska Electrical Intertie System - a system that will have to cross IRAs to ever have additional segments completed. The first segment between the Swan and Tye hydroelectricity projects between Ketchikan and Wrangell was finished in 2011. For all of those reasons, the revised Forest Plan should identify the locations of all renewable energy projects potentially available for construction in the region and then allow access routes for both construction and maintenance roads and for transmission power lines to reach the sites from load centers. This can be done by creating a new Land Unit Designation LUD covering renewable energy sites, or by revised regulations to govern the existing rule providing firm opportunities for road and power line access to renewable energy sites. The original IRA rule, issued by Executive Order 12866 in 1993, certainly intended to permit access for road construction and utility corridors for all non-forestry projects. The 1993 rule specifically recognized that the impact of the Rule could lead to lost business opportunities, which "may be more pronounced" in Alaska than nationwide - effects in Alaska likely increasing in the longer term.

The 2008 Forest Plan also needs to be modified to take into better account updates to the State of Alaska's Southeast Transportation Plan and the Alaska Energy Authority's 2011 Southeast Regional Integrated Power Plan. The plan needs to permit access for road links where needed in the region, such as the Bradfield Canal road to Canada, a road along a corridor to permit a high voltage electric transmission line to connect with the British Columbia system, a road to permit lower-cost power transmission between Kake and Petersburg, and a road to permit cheaper construction of a power line to access Soule River (Hyder) hydroelectric development.

## 4.82 GEOGRAPHY – YAKUTAT RANGER DISTRICT

Comments specific to the Yakutat Ranger District are listed here. Statements listed are often excerpted from larger comments, and are verbatim. Each comment was also coded to the appropriate substantive Statements of Concern.

You could erase every environmental protection and it still wouldn't pencil out. Witness for example the State Lost Coast (Icy Bay – Cape Yakataga) operation. No one would seriously claim that environmental restrictions hampered that operation, but the operators pulled out leaving over a hundred million board feet standing. One could also look at the decline in Sealaska's operation, which is similarly free of environmental worries. If it were profitable to mill logs, then mills could buy logs from Sealaska. It is not so they don't.

While the 2008 Forest Plan identified those minerals resource tracts which are most likely to be developed, it completely neglected to consider the potential need to withdraw areas to conserve, enhance, and protect forest resources. Both the Yakutat Forelands and Duke Island possess unique cultural, geological, zoological, recreational and scenic special features. The amendment should consider withdrawing these lands from mineral development to protect the areas' unique features.

## 5.0 SUBMISSION INDEX

A Comment Index was created to provide a master list of unique and coded form letter template submissions received and shows how those submissions were coded. Submissions are listed alphabetically by the last name of the commenter and notes which Statements of Concern (SOCs) that were coded to and informed by that submission.

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Friberg, Mary Tongass Wildlife Planner, US Forest Service	88	TERR3-A, WCS1-B
Friberg, Mary US Forest Service TNF	57	WCS1-E
Garvey, Lydia	126272	GEO-POW, GEO-PTR, GEO-WRG, TIM2-B
Garvey, Lydia Public Health Nurse	176	ECO1-A, ECO2-A
Garza, Corrine Central Council Tlingit and Haida Indian Tribes of Alaska	126273	ACK 1-B, ENER 3-A, ENER 3-B, ENER 3-E, ENER 3-F, ENER 3-L, ENER 3-N, ENER 3-W, ENER 3-X, GEO-CRAIG, GEO-JUN, GEO-POW, LUD LUD-MIN 1, LUD-NEW ENER-4, LUD-New/ Communities – 1, MAN 8-A, MAN 8-G, MAN2-H, MINE 1, MINE 2, MINE 3, MINE 6, MINE 9, RR-1, RR-2, RR-5, RR-6, SOC1-B, SOC1-E, SOC2-F, SOC2-G, TUS LUD-1
Garza, Patrick	203	CULT 5, SUB 3B
Gebhards, John Retired	117	MAN9-A, SCIENCE-B
Gemmell, Thomas United Southeast Alaska Gillnetters	150	AQUA1-F, DATA-A, FISH1-B, MAN 7-F, MISC – EDIT 8, SCIENCE-A, SCIENCE-C
Gemmell, Tom United Southeast Alaska Gillnetters	93052	MAN2-U
Goodwin, Sally	116	ECO1-A, GEO-POW, GEO-PTR, GEO-WRG, SCIENCE-B, SOC3-A, TIM2-A, TIM11-A
Graham, Owen Alaska Forest Association	125	AQUA1-D, CUMUL 1, DATA-A, MAN 4-C, MAN 8-C, MAN 8-D, MAN2-B, MAN5-F, RR-2, SOC2-D, SOC2-H, TERR1-C, TERR2-B, TERR3-H, TIM 1-D, TIM 1-E, TIM 1-F, TIM 1-G, TIM 10-A, TIM 3-F, TIM 4-B, TIM 5-A, TIM 6-A, TIM 9-F, TIM3-B, TIM3-D, WCS2-H
Graham, Owen Commenter at Ketchikan Public Meeting	736	SOC2-H, TIM 9-F, MAN2-B
Greeley, James Tomaso Shellfisho	35	FISH2-A

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Grimm, Bob Alaska Power and Telephone Company (AP&T)	40	ENER 1-J, ENER 1-N, ENER 3-A, ENER 3-E, ENER 3-J, ENER 3-W, GEO-WRG, MAN 7-A, MAN 7-D, MAN2-B, MINE 2, RR-1, SOC1-E
Grimm, Robert Alaska Power and Telephone	126271	AQUA1-A, DATA-A, ENER 1-A, ENER 1-J, ENER 1-L, ENER 3-A, ENER 3-B, ENER 3-G, ENER 3-I, ENER 3-L, ENER 3-M, ENER 3-W, ENER 3-X, ENER 3-Y, GEO-PTR, LUD-NEW ENER-1, LUD-NEW ENER-11, LUD-NEW ENER-2, LUD-NEW ENER-3, LUD-NEW ENER-4, LUD-NEW ENER-6, LUD-NEW ENER-9, LUD-New/ Communities – 1, MAN 7-A, MAN 8-A, MAN2-H, MAN2-K, MINE 2, MINE 3, REC 1, RR-1, RR-2, RR-3, SOC2-F, TERR3-C, TOUR 3-B, TRANS 3A, TRANS 3B, TUS LUD-1
h, a	94701	MAN9-A
Haines, Public Meeting Haines Public Meeting	55	ECO1-A, ENER 1-Q, GEO-JUN, LUD-W 8, MAN 7-E
Hansen, Kathy Southeast Alaska Fishermen's Alliance	178	AQUA1-E, FISH1-A, FISH1-E, FISH3-A, LUD-W 5, MAN 3-J, MAN 4-H, MAN5-A, MAN5-H, SOC2-K, SOC3-A
Harris, Mark	81	ECO1-A, MAN 9-A, SOC2-E, TIM 4-A, TIM2-B
Harris, Scott Latitude Adventures LLC	206	ECO1-A, GEO-SIT, SOC2-E, SUB 3H, TIM2-A, TIM11-A, TOUR 1-A
Harrison, Justin	74	ACK 1-A
Hart, Karla	186	AQUA2-F, TIM2-B, TOUR 3-C
Hawkins, Merle Commenter at Ketchikan Public Meeting	737	CULT 10, GEO-KET, MINE 4, REC 3, TIM3-B
Hed, Scott	12	ENER 3-P, MAN 3-A, RR-14, SCIENCE-B, SOC1-A, SUB 3C, WCS1-B
Henderson, Tom Commenter at Ketchikan Public Meeting	745	FISH2-B, GEO-PTR, MAN7-Q, REC 4, TRANS 1A
Henderson, Tom Pearl of Alaska- oyster grower	41	LUD – New/Other 2
Henton, Dolly Alaska Power and Telephone	160	ENER 1-O, ENER 3-C, GEO-CRAIG, LUD-NEW ENER-10, MAN2-O, RR-4, SOC2-A, SOC2-H, TIM 1-B, TIM 9-I
Henton, Michael	156	SOC3-C
Hillstrand, Nancy Pioneer Alaskan Fisheries Inc	123	ACK 1-B, AQUA1-G, CUMUL 3, CUMUL 4, CUMUL 7, ECO1-A, ECO2-A, FISH3-A, MAN 1-A, SCIENCE-B, TERR3-E, TIM2-A
Hooper, Yvonne Head Start Schools	212	SOC2-A
Hopwood, John	102340	TIM 9-I
Houser, Victoria US Forest Service	43	GEO-TB
Houser, Victoria USFS - Prince of Wales Island	9	REC 5

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Huberth, Pete Forest Industry Consulting	42	ACK 1-B
Hupp, Jerry Alaska Chapter of the Wildlife Society	126270	DATA-A, TERR 3-I, TERR3-I
Hyder, Alison	99418	ECO1-A
Iwamoto, Karen US Forest Service	133	ENER 1-F, ENER 3-A, GEO-KET, TUS LUD-4
Jackson, Edna Organized Village of Kake	23	RR-22
Jackson, Edna Organized Village of Kake	92	CULT 6, GEO-PTR, MAN 6-A, MAN1-M, SUB 3A, SUB 3G, TERR3-F, TIM 9-A
Jackson, Mike A. Organized Village of Kake	93	CULT 6, ENER 2-C, MAN 6-A, TIM 9-A, TIM 9-C
Jacobson, Rich	46	WCS1-C
Janzen, Desiree	218	MAN2-O, SOC2-H, TIM 1-A, TIM 1-C, TIM 9-B
John, Eileen Metlakatla Indian Community	204	SOC2-B, TIM 1-B
Johnson, D. Douglas Ocean Renewable Power Company	208	ENER 1-L, RR-1
Johnson, Jeremy Josiah	84	MAN9-A, TERR2-A, TERR3-A, WCS1-A
Juneau, Public Meeting Juneau Public Meeting	29	ECO2-A, GEO-JUN, SCIENCE-B, TERR3-D, TERR3-H, TOUR 3-A
Kampnich, Michael Commenter at Craig Public Meeting	756	LUD II -1, MAN 4-A, SOC2-F, TRANS 3C, TRANS 3D
Kemp, Molly resident	107	AQUA2-A, AQUA2-F, GEO-SIT, TOUR 1-H
Ketchel, Barbara housewife	98	ECO1-A, GEO-POW, TIM2-B
Ketchel, Lindsey Southeast Alaska Conservation Council	111290	MAN9-A, SUB 1C, TERR1-A, TERR2-A, TIM2-A, TIM3-A, WCS1-A
Ketchikan, Public Meeting Ketchikan Public Meeting	51	AQUA2-I, CULT 1, CULT 10, FISH1-C, FISH2-A, FISH2-B, FISH3-C, GEO-KET, GEO-PTR, LUD - SRR 1, LUD - RR 2, MAN 7-F, MAN2-B, MINE 10, MINE 4, REC 3, SCIENCE-B, SOC1-C, SOC2-A, SOC2-L, TERR1-A, TERR2-A, TERR3-D, TIM 1-F, TIM 1-G, TIM 6-D, TIM 9-F, TRANS 1A
King, Jim and Mary Lou	101	AQUA1-B, CULT 11, ECO2-A, MAN 3-H, MAN 7-K, REC 3, SOC2-E
Kirchhoff, Matt Wildlife Biologist	95	MAN1-L, MAN2-O
Kirchhoff, Matthew Wildlife Biologist	94	ACK 1-B
Kirsch, Katya	113	AQUA1-B, AQUA1-C, LUD - New/Other 3, MAN9-A, Mine 7, RR-9, SCIENCE-A, SCIENCE-B, SOC2-E, TERR3-D, TIM 9-A, TIM2-A

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Lapp, Jerry	124816	ENER 1-C, TRANS 4F
Lara, Derek	67	ACK 1-A
Larry, Coupe Alaska Power & Telephone	213	ENER 1-H, LUD-NEW, ENER-5, MAN2-L, RR-5, SOC2-F, SOC2-G, TUS LUD-9
Lawler, Mark	70	ECO1-A, MAN9-A, SOC3-B, TERR2-A, TERR3-A, TIM 4-A, TIM2-A, WCS1-A, WCS2-A
Lawrence, Nathaniel Natural Resources Defense Council	111290	MAN9-A, SUB 1C, TERR1-A, TERR2-A, TIM2-A, TIM3-A, WCS1-A
Lawrence, Nathaniel and Strong, Zack Natural Resources Defense Council	179	DATA-A, GEO-POW, MAN 1-I, MAN 1-N, MAN2-A, MAN2-C, MAN2-D, MAN2-V, MAN9-A, MISC-ACKN, RR-9, SCIENCE-B, SCIENCE-C, TERR3-A, TERR3-D, TIM 4-D, TIM 9-B, TIM3-A, WCS1-B, WCS1-F, WCS2-B, WCS2-D, WCS2-G
Layman, Zachary Alaska Power and Telephone	166	ENER 1-B, ENER 3-C, GEO-CRAIG, LUD-NEW ENER-10, MAN2-B, RR-4, SOC2-A, SOC2-H, TIM 1-B
Leatherman, Alden	111	SOC2-M, TIM2-A
Lee, Eric Commenter at Petersburg Public Meeting	749	FISH3-A, GEO-PTR, SOC1-A, SOC2-M, SUB 1A, TERR1-A, TIM 9-H, TIM2-B, TOUR 2-A
Lewis, John Hazmat instructor	185	ENER 1-P
Lewis, Robert US Forest Service	38	GEO-KET, LUD - ML 1, LUD - SV 3, LUD - TP 2, RR-1, WCS2-F
Lindekugel, Buck Southeast Alaska Conservation Council	105	AQUA2-F, CUMUL 2, DATA-A, GEO-JUN, GEO-POW, GEO-PTR, GEO-YAK, LUD LUD-MIN 4, LUD-OGH 1, MAN9-A, RR-24, SCIENCE-C, SOC1-A, SOC1-D, SOC2-E, TIM 5-C, TIM 9-A, TIM 9-B, TIM 9-F, TIM 9-I, TIM 11-A, WCS1-A, WCS2-B
Lindekugel, Buck Commenter at Petersburg Public Meeting	750	AQUA1-B, ENER 1-D, FISH3-A, GEO-PTR, LUD - SV 1, LUD-New/Other 6, MAN 3-N, MAN 7-H, MAN2-J, SOC1-A, SUB 3C, TOUR 1-A
Lish, Christopher	31	ECO1-A, MAN9-A
Lish, Christopher	177	ECO1-A, MAN9-A, SOC3-B
Loughner, Darlene	82	ACK 1-A
Lynch, Tommy Organization Inc.	200	ENER 1-A, ENER 1-O, ENER 3-C, GEO-POW, LUD-NEW ENER-10, MINE 2, MINE 4, RR-1, RR-4, SOC2-A, SOC2-F, SOC2-H, TIM 1-B
MacKinnon, Neil First Things First Alaska Foundation	126274	AQUA1-A, DATA-A, ENER 1-J, ENER 1-K, ENER 1-L, ENER 3-A, ENER 3-B, ENER 3-L, ENER 3-M, ENER 3-W, ENER 3-X, LUD-NEW ENER-1, LUD-NEW ENER-11, LUD-NEW ENER-2, LUD-NEW ENER-3, LUD-NEW ENER-4, LUD-New/ Communities - 1, LUD-RR 1, MAN 7-A, MAN 8-A, MAN 8-B, MAN2-H, MAN2-K, MINE 3, REC 1, RR-1, RR-2, RR-5, SOC2-F, SOC2-G, TERR3-C, TOUR 3-B, TRANS 3A, TRANS 3B, TUS LUD-1

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Maggi, Mark Alaska Power and Telephone	158	ENER 1-O, ENER 2-C, ENER 3-H, RR-8, TIM 1-C, TIM 1-F, TIM 9-I
Magnuson, Judy Port Protection Community Association	21	ECO1-A, SOC3-B, SOCIO3-A, TIM 9-I, WCS2-A
Manuel, Athan Sierra Club	111290	LUD-New/Other 3, MAN9-A, RR-9, SUB1-C, TERR1-A, TERR2-A, TIM2-A, TIM3-A, WCS1-A
Martin, Glen Project Manager -- Permitting / Licensing / Compliance, Alaska Power & Telephone	143	DATA-A, ENER 1-M, ENER 3-C, MAN 7-A, RR-1, SOC1-E, SOC2-G, TUS LUD-1, TUS LUD-5, TUS LUD-7
Martinez, Cass	94069	ECO1-A
Mcbreen, Joan	135	MAN9-A, REC 6, TRANS 4-C
McConnell, Mim City and Borough of Sitka, Mayor	129	ENER 1-N, ENER 3-A, LUD-NEW ENER-6, MAN2-H
McCullough, Karin	199	AQUA1-B, GEO-PTR, MAN 3-A, REC 5, SCIENCE-B, TIM2-A, WCS1-A
McCullough, Karin Commenter at Petersburg Public Meeting	753	CUMUL 5, MAN2-P
McDonald, Victoria	39, 230	AQUA1-C, AQUA2-A, ECO1-A, ECO2-A, GEO-KET, GEO-WRG, Mine 7, REC 5, SCIENCE-B, SOC1-A, SOC2-M, SUB 2A, TERR1-A, TIM2-A, TIM3-C
McGinnis, Margaret	26	ECO1-A, TIM2-A
McLeod, Timothy Alaska Electric Light and Power Company	126271	AQUA1-A, DATA-A, ENER 1-A, ENER 1-J, ENER 1-L, ENER 3-A, ENER 3-B, ENER 3-F, ENER 3-I, ENER 3-L, ENER 3-M, ENER 3-W, ENER 3-X, ENER 3-Y, GEO-PTR, LUD-NEW ENER-1, LUD-NEW ENER-2, LUD-NEW ENER-3, LUD-NEW ENER-4, LUD-NEW ENER-6, LUD-NEW ENER-9, LUD-New/ Communities – 1, MAN 7-A, MAN 8-A, MAN2-H, MAN2-K, MINE 2, MINE 3, REC 1, RR-1, RR-2, RR-3, SOC2-G, TERR3-C, TOUR 3-B, TRANS 3A, TRANS 3B, TUS LUD-1
McMurren, Douglas Alaska Power and Telephone	155	ENER 1-O, ENER 3-C, GEO-CRAIG, LUD-NEW ENER-10, MAN2-B, RR-4, SOC2-A, SOC2-H, TIM 1-B
Metcalf, K. J. Friends of Admiralty Island	171	CULT 7, GEO-ANM, LUD-W 6, MAN 3-P, MAN9-A, MINE 8, SCIENCE-E, TERR3-G, TIM 9-A
Miller, Kristen Alaska Wilderness League	111290	MAN9-A, SUB 1C, TERR1-A, TERR2-A, TIM2-A, TIM3-A, WCS1-A
Mills, Nora Alaska Power & Telephone	161	ENER 1-B, ENER 3-C, GEO-CRAIG, LUD-NEW ENER-10, MAN2-B, RR-4, SOC2-A, SOC2-H, TIM 1-B
Moore, Brian National Audubon Society	111290	MAN9-A, SUB 1C, TERR1-A, TERR2-A, TIM2-A, TIM3-A, WCS1-A
Moore, Frank	25	REC 6
Moorhead, Walter citizen	137	ECO1-A, GEO-PTR, LUD-W 8, TIM2-B
Morrison, Eric Douglas Indian Association	148	CULT 3, CULT 6, MAN 6-A, MAN 6-B, MAN 6-F, RR-18, TIM 9-A, TRANS 3F

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Morrison, Gary	22	LUD-NEW ENER-5
Muller, Conrad	100	TIM2-A
Munoz, Cathy Representative Alaska State Legislature	227	AQUA1-A, DATA-A, ENER 1-A, ENER 1-E, ENER 1-G, ENER 3-I, ENER 3-M, ENER 3-U, ENER 3-X, LUD-NEW ENER-1, LUD-NEW ENER-2, LUD-NEW, ENER-6, LUD-New/ Communities – 1, MAN 7-A, MAN 8-B, MINE 2, REC 1, RR-1, SOC1-E, TERR3-C, TOUR 3-B, TRANS 3A, TUS LUD-1, WCS1-H
Munoz, Cathy Representative, House District 31, Juneau	140	DATA-A, ENER 3-C, LUD-NEW ENER-2, LUD-NEW ENER-4, MAN 7-A
Murkowski, Frank H. Former Governor and Former US Senator – State of Alaska	226	AQUA1-A, AQUA2-C, DATA-A, ENER 1-A, ENER 1-J, ENER 3-A, ENER 3-I, ENER 3-L, ENER 3-M, ENER 3-X, LUD – RR 1, LUD LUD-MIN 1, LUD-NEW ENER-11, LUD-NEW ENER-2, LUD- NEW ENER-4, LUD-NEW ENER-6, LUD-New/ Communities – 1, MAN 8-A, MAN 8-B, MAN 8-C, MAN 8-D, MAN2-H, MAN2-K, MINE 1, MINE 3, REC 1, RR-1, RR-2, RR-5, SOC2-G, TERR3-C, TIM 1-D, TIM 10-C, TIM 5-E, TOUR 3-B, TRANS 3A, TUS LUD-1
Murkowski, Lisa US Senator - State of Alaska	136	ENER 1-A, ENER 1-K, ENER 3-B, ENER 3-X, GEO-CRAIG, GEO-KET, GEO-PTR, LUD – New/Other 4, LUD-NEW ENER-9, LUD-New/ Communities – 1, MAN 3-D, MAN 7-A, MAN 8-A, MAN2-K, MINE 1, RR-1, RR-13, RR-19, RR-3, SOC2-F, SOC2-H, TIM 1-C, TIM 1-D, TIM 1-I, TIM 10-A, TIM 5-B, TIM 6-B, TIM 6-C, TIM 9-B, TIM3-B, TRANS 4A
Murkowski, Lisa US Senator - State of Alaska	228	ENER 1-B, ENER 1-K, ENER 1-N, ENER 3-B, ENER 3-C, ENER 3-K, ENER 3-X, GEO-KET, GEO-WRG, LUD II -1, LUD-NEW ENER-12, LUD-New/ Communities – 1, MAN 3-D, MAN 8-A, MAN2-K, MINE 1, MINE 2, RR-1, RR-13, RR-3, RR-6, SOC1-E, SOC2-F, SOC2-H, TIM 10-A, TIM 10-C, TIM 5-B, TIM 9-D, TRANS 3B
Naoroz, Peter Kootznoowoo, Inc.	196	ENER 1-A, ENER 3-A, ENER 3-E, ENER 3-L, ENER 3-N, ENER 3-W, GEO-CRAIG, LUD – New/Other 1, LUD-NEW ENER-4, LUD-New/ Communities – 1, MAN 3-E, MAN 7-A, MAN2-B, MAN2-H, MAN2-K, MINE 1, RR-1, RR-2, SOC2-F, SOC2-G, TUS LUD-1, TUS LUD-4
Neimi, Martin & Chris retired educators	190	ACK 1-A
Nelson, Pete Defenders of Wildlife	111290	MAN9-A, SUB 1C, TERR1-A, TERR2-A, TIM2-A, TIM3-A, WCS1-A
O'Brien, D Jay Commenter at Ketchikan Public Meeting	739	TRANS 1A
O'Brien, Diane Commenter at Wrangell Public Meeting	731	TIM4-F
O'Brien, John and Audrey Lifelong Alaskans	187	ENER 1-M, TRANS 3C

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Oien, Jack	45	SOC2-H, TIM 9-I
Olsson, Kris	11	RR-13, SCIENCE-A, SOC1-A, SUB 3C
Parker, Carolyn	90	MAN9-A, SCIENCE-B, SOC3-B, TERR2-A, TERR3-A, TIM 4-A, TIM2-A, WCS1-A, WCS2-A
Parker, Michele Marie US Forest Service TNF	30	MAN 7-R
Petersburg, Public Meeting Petersburg Public Meeting	52	AQUA2-A, ECO1-A, ENER 1-O, FISH3-A, GEO-PTR, LUD – SV 1, LUD – SV 2, LUD-W 1, MAN 7-A, MAN1-C, MAN2-J, SOC1-A, SOC1-F, SOC3-A, SUB 1A, TERR1-A, TIM2-A, TIM5-D, TIM 9-H, TIM 9-I, TIM2-B, TIM3-A, TIM 11-A, WCS1-I
Phillips, Patricia Pacific Fishing, Inc.	167	ENER 1-G, ENER 1-N, ENER 2-B, ENER 3-J, ENER 3-N, ENER 3-W, GEO-HOO, MAN 8-I, MAN2-O, MAN5-I, SOC1-E, SOC2-A, SOC2-B, SOC2-H, TIM 7-B, TIM 9-B, TIM3-A, TIM3-D, TUS LUD-6, WCS1-K
Piazza, Tim US Forest Service	44	MAN5-I, RR-11, SCIENCE-A
Piazza, Timothy US Forest Service	4	RR-14
Porter, Shane H & L Salvage	216	MAN2-O, SOC2-B
Portman, Carl Resource Development Council	164	ENER 3-A, ENER 3-B, ENER 3-X, LUD – New/Other 1, LUD-NEW ENER-4, LUD-New/ Communities – 1, MAN 8-C, MAN 8-D, MAN2-B, MAN2-H, MAN2-K, MINE 2, MINE 3, MINE 4, MINE 6, RR-1, RR-15, RR-2, SOC2-F, SOC2-H, TIM 1-A, TIM 1-D, TIM 1-G, TIM 1-I, TIM 3-B, TIM 4-B, TIM 6-B, TIM 7-C, TIM 9-D, TUS LUD-1
Pratt, Teresa	202	GEO-CRAIG, GEO-POW, MINE 4, MINE 6, SOC2-B, TIM 1-C
Price, Elaine SE Conference	193	ENER 3-G, MAN2-C, MINE 4, SOC2-H
Pritzker, Eileen	83	ACK 1-A
Puffer, Ann	32	AQUA2-H, DATA-A
Puffer, Ann Commenter at Haines Public Meeting	760	MAN 7-E
Quinto, Marcelo Alaska Native Brotherhood Camp 70	197	CULT 8, ENER 1-A, ENER 3-A, ENER 3-E, ENER 3-L, ENER 3-N, ENER 3-W, GEO-CRAIG, LUD – New/Other 1, LUD-NEW ENER-4, LUD-New/ Communities – 1, MAN 3-E, MAN 3-K, MAN 7-A, MAN2-B, MAN2-H, MAN2-K, MAN3-S, MINE 1, MINE 2, RR-1, RR-2, RR-5, SOC2-F, SOC2-G, TUS LUD-1, TUS LUD-4
Rafter, Mary	121	ACK 1-B
Randrup, Dave Commenter at Petersburg Public Meeting	752	MAN 6-I, MAN1-C, TERR1-A, GEO-PTR

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Randup, David	126268	ACK 1-B, MAN 1-O, MAN 1-C, MAN1-D, MAN1-E, MAN1-K, SCIENCE-D, SOC3-A, SUB 3F, TERR1-B, TERR3-D, TIM 7-B, WCS2-B, WCS2-D
Reeck, Jill US Forest Service	102	MISC – EDIT 3
Reeck, Jill US Forest Service	103	MISC – EDIT 3
Roberts, Frank US Forest Service	6	TERR1-B, TIM 9-I, WCS1-D
Roemmich, Cathie Juneau Chamber of Commerce	126269	ENER 1-A, ENER 3-A, ENER 3-B, ENER 3-E, ENER 3-F, ENER 3-L, ENER 3-S, ENER 3-X, GEO-JUN, LUD LUD-MIN 1, LUD-NEW ENER-11, LUD-NEW ENER-4, LUD-NEW ENER-7, LUD-New/Communities-1, MAN2-H, MAN2-K, MINE 1, MINE 3, MINE 5, MINE 6, RR-1, RR-15, RR-2, RR-6, SOC2-G, SOC2-L, TRANS 3C, TUS LUD-1
Roginski, Peter Commenter at Ketchikan Public Meeting	742	FISH3-C, GEO-KET, MAN 7-F
Rooney, Tim City and Borough of Wrangell	173	ENER 2-C, ENER 3-R, GEO-WRG, LUD – New/Other 4, LUD – SV 4, MAN2-B, MAN2-W, MINE 4, REC 6, RR-11, TIM 4-I, TOUR 1-B, TRANS 2B, TRANS 3C, TRANS 3H, WCS2-B, WCS2-F, WCS2-H
Rose, Chris Renewable Energy Alaska Project (REAP)	209	ENER 1-G, ENER 2-B, ENER 3-A, MAN 8-A, SOC2-G
Ross, Carol 30 yr. resident of Wrangell	146	ECO1-A, GEO-TB, GEO-WRG, TIM 7-C, TIM 9-B, TIM2-A
Ross, Isla	62	ECO1-A
Round, Michael Southern Southeast Regional Aquaculture Association	5	FISH1-D, GEO-KET
Round, Michael Southern Southeast Regional Aquaculture Association	49	FISH1-C, GEO-KET, LUD - SRR 1, LUD – RR 2
Round, Mike Commenter at Ketchikan Public Meeting	735	FISH1-C, GEO-KET, LUD - SRR 1, LUD – RR 2
Rubio, Jose Alaska Power and Telephone	217	GEO-POW, MINE 4, SOC2-H, TIM 1-B
Rush, Keith The Nature Conservancy	149	AQUA1-B, AQUA2-F, MAN 3-A, MAN 3-H, MAN2-C, MAN5-A, MAN9-A, RR-1, SOC1-F, SOC2-N, TERR2-A, TERR3-A, TERR3-B, WCS1-A
Rushmore, Carol Commenter at Wrangell Public Meeting	730	MAN 6-H, REC 6, SOC2-M, TIM2-A, WCS2-F
Sallee, Mike Commenter at Ketchikan Public Meeting	743	GEO-KET, TERR1-A, TERR2-A

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Sanford, Merrill City and Borough of Juneau, Mayor	124806	AQUA1-A, DATA-A, ENER 1-J, ENER 1-K, ENER 1-L, ENER 3-A, ENER 3-B, ENER 3-L, ENER 3-M, ENER 3-W, ENER 3-X, LUD-NEW ENER-1, LUD-NEW ENER-11, LUD-NEW ENER-2, LUD-NEW ENER-3, LUD-NEW ENER-4, LUD-New/ Communities - 1, LUD-RR 1, MAN 7-A, MAN 8-A, MAN 8-B, MAN2-H, MAN2-K, MINE 3, REC 1, RR-1, RR-2, RR-5, SOC2-G, TERR3-C, TOUR 3-B, TRANS 3A, TRANS 3B, TUS LUD-1
Schmitt, Terry	214	SOC2-A
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