



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

**In Reply Refer To:
OSM.B25030**

MAY 20 2025

USDA Tongass National Forest
ATTN: Monique Nelson, Forest Supervisor
ATTN: Barb Miranda, Deputy Forest Supervisor
ATTN: Erin Mathews, Tongass Forest Plan Revision Coordinator
648 Mission Street, Suite 110
Federal Building
Ketchikan, Alaska 99901-6591

Dear Acting Tongass National Forest Supervisor and others,

I am writing on behalf of the Southeast Alaska Subsistence Regional Advisory Council (Council) to provide its input on the revision of the Tongass National Forest Plan (Forest Plan) currently taking place. At our March 21-23, 2025, public meeting, the Council was provided the opportunity to review the draft Tongass National Forest Plan Assessment and submit feedback through the Council Coordinator. During this meeting, the USDA Forest Service staff held a Forest Plan engagement session and a follow-up evening workgroup meeting to collect comments from Council members.

The Council recognizes the importance of this land management plan and the role it plays in the management and administration of activities on the forest that will or may impact subsistence resources. To enhance the Forest Plan, the Council listed a number of items for improvement including need for consultations, access to cleared areas, enforcement of regulations, standards for non-timber forest products, standards for timber, development of Community Use Areas, and the development of subsistence monitoring plans. The summaries of these items and suggestions expressed during these engagement sessions are below for consideration by the USDA Forest Service as a part of the Forest Plan revision process.

Consultation

Consultation should occur on all proposed projects and actions that relate to subsistence uses and should include extensive community input collected by attending local community organization

and government meetings, such as tribal councils, community government, and partnership groups.

Subsistence standards and guidelines should encourage staff to:

- Engage Council members to assist with community consultation, especially when proposals are not created by local residents.
- Report out the National Environmental Policy Act (NEPA) project list at Council meetings, when possible, and email small NEPA projects list to Council members through the Council Coordinator.
- Provide quantitative and explicit metrics to evaluate progress towards desired conditions while providing flexibility to be adaptable when input from the Council and local communities suggest that changes are necessary.
- Consult with subsistence users and the Council regarding new outfitter guide activities and renewals of existing outfitter and guide activities.
- Encourage subsistence staff and district rangers to build better relationships around tribal consultation to hold more effective consultation and incorporate tribal input into USDA Forest Service activities.
- Provide training for tribes on the importance of and opportunities for consultation with the Forest Service.
- Strive to have two-way conversations between the district and affected tribes early and before decisions have been made.
- Encourage district rangers to pursue opportunities with local tribes to apologize for, acknowledge, and heal past wrongs that have caused trauma.

Access

Road access to timber-cleared areas is critical to local subsistence users for collecting firewood and berries and harvesting deer. The Council would like to see efforts made to keep temporary roads open during the first 15-20 years after the initial timber clearing for subsistence use.

Subsistence standards and guidelines should encourage staff to:

- Discourage blocking access to closed roads whenever possible, even though they are not going to be maintained, so that they may be used for subsistence purposes as they return to a natural state.
- Contract local entities to close roads 15-20 years post-clearcut timber harvest to allow rural users to collect firewood and berries from harvested areas.
- Work with tribal or local crews to perform road storage or closure work.
- Hold public hearings in affected communities and consult with subsistence staff, communities, and tribes when changing road access (Access Travel Management plans). This action should include attending community group and government meetings such as tribal councils and city governments, and engaging Council members and community partnership groups, to request local input prior to making decisions.
- Develop and share plans for recreation projects and maintenance with communities and tribes.

- Engage with small communities to gauge interest in developing access projects (cabins, trails, etc.).

Enforcement

Subsistence standards and guidelines should encourage staff to:

- Work with the Council to help determine enforcement needs and pass those requests on to law enforcement staff.
- Hold more regular conversations between subsistence and law enforcement staff to stay updated on fish and wildlife enforcement needs.

Non-Timber Forest Products

Subsistence standards and guidelines should encourage staff to:

- Require a minimum standard for all non-timber forest product permits to be discussed with the local tribes and communities to identify any traditional territories or subsistence uses that could be affected by issuing or renewing permits.
- Develop an online notification system so people are aware of non-timber forest product permit applications and renewals.

Timber

Subsistence standards and guidelines should encourage staff to:

- Limit old growth timber harvest to free use, cultural-use wood, or small-scale local timber sales. The Council does not support large scale old growth timber harvest.
- Support second growth harvest if it encourages local use and supports local economies or supports fish and wildlife habitat improvement.
- Harvest timber by small clearcuts if it provides free use wood and benefits deer harvest.
- Encourage the continuation of shoreline, stream, and other buffer zone management practices that are designed to protect sensitive ecosystems and fish and wildlife habitats.
- Incorporate Traditional Ecological Knowledge (TEK) and Local Knowledge into the selection of timber harvest location and practices. Many TEK holders can help identify the best places for wildlife corridors and other wildlife features based on their understanding of historical landscape use by the resources.
- Require slash mitigation measures in timber harvest areas to mitigate subsistence access issues.
- Discourage land swaps, trading state lands for federal lands, as measures used to clearcut the Tongass National Forest.

Community Use Areas

If Community Use Areas are developed, their geographic scope, location, and management plan should be developed through the process outlined above in the ‘Consultation’ section of the letter. Using historic harvest by Wildlife Analysis Area would help in the public consultation process for selecting Community Use Area locations. Management plan components that should be discussed in depth include desired infrastructure, allowable special uses activities, allowable

timber harvest and forest management activities. The Council feels strongly that the existence of Community Use Areas should not detract from the importance of other locations for subsistence uses.

Subsistence standards and guidelines should encourage staff to:

- Engage in extensive community input before any change to the area management or project can be enacted.
- Remain flexible in Community Use Area locations and management, acknowledging that forest succession will change subsistence use.

Subsistence Fish/Wildlife Monitoring Plan Development

When possible and as capacity allows, the USDA Forest Service should strive to work with each community to establish projects in partnership with local tribes and community organizations that focus on their primary resource concerns. The Council supports the development of a subsistence monitoring plan and would like to provide continuing input on the monitoring plan.

Subsistence standards and guidelines should encourage staff to:

- Align the review of the fish and wildlife monitoring project priority lists with the winter meeting where the Council is developing fish or wildlife proposals, respectively.
- Develop a mechanism for the public to share interests.
- Address topics regarding competition for subsistence food, outfitter guide coordination concerns, updating law enforcement and investigations staff subsistence priorities, and wildlife and fish monitoring needs.

The expectation of the Council is to continue to be engaged throughout this process, regardless of changes in Tongass National Forest leadership. Further, the Council requests that, to the extent possible, the Forest Plan be more responsive to local input with limited elements of the plan imposed by outside entities.

The Council appreciates your time considering its concerns and suggestions regarding the Forest Plan revision and looks forward to engaging with the USDA Forest Service throughout the revision process.

If you have any questions regarding this letter, please contact me via DeAnna Perry, Subsistence Council Coordinator, USDA Forest Service, at deanna.perry@usda.gov or (907) 209-7817.

Sincerely,



Don Hernandez,
Chair

cc: Federal Subsistence Board
Southeast Alaska Subsistence Regional Advisory Council Members
Office of Subsistence Management
Interagency Staff Committee
Administrative Record