



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

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

**In Reply Refer To:  
OSM.R26036**

**MARCH 19 2026**

**SUBMITTED VIA ONLINE COMMENT PORTAL (CARA)**

Tongass National Forest  
USDA Forest Service  
ATTN: Tongass Forest Plan Revision Team  
648 Mission Street, Suite 110  
Federal Building  
Ketchikan, Alaska 99901

Tongass National Forest  
USDA Forest Service  
ATTN: Monique Nelson, Forest Supervisor  
ATTN: Barb Miranda, Deputy Forest Supervisor  
ATTN: Erin Mathews, Tongass Forest Plan Revision Coordinator  
8510 Mendenhall Loop Rd  
Juneau, Alaska 99801

Dear Tongass National Forest Supervisor and others,

I am writing on behalf of the Southeast Alaska Subsistence Regional Advisory Council (Council) to provide additional input on the revision of the Tongass National Forest Plan (Forest Plan). As you are aware, the Council was formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Southeast Alaska region. Some of the Council's duties include reviewing and evaluating regulations, policies, management plans, and other matters that may impact subsistence resources critical to the southeast Alaska communities it serves.

This letter addresses the current public comment period that is open for the Notice of Initiation of the development of a proposed plan revision and Notice of Intent to prepare an environmental

impact statement (NOI)<sup>1</sup> and is intended to build upon the previous comments this Council provided in a letter dated May 20, 2025.

During our March 10-13, 2026, public meeting in Juneau, our Council was happy to meet the new Tongass National Forest Supervisor, Monique Nelson. The Council received an overview of the Tongass Forest Plan revision process and heard additional information about the current status of the plan and next steps moving forward. The Council then developed the following formal comments for Tongass National Forest leadership to consider throughout the Forest Plan's development, addressing the Forest Plan need for change, preliminary plan content, and future plan direction.

- Subsistence access should be prioritized when planning forest projects:
  - Community and Tribal consultation should be undertaken to address access travel management and recreation projects to maintain and improve access for subsistence use
  - Shared stewardship should be used to maintain subsistence access
- Timber is important for the economy of rural communities; however, the Council would like to see:
  - Continued ban on round log export
  - A stop to large-scale old growth harvest
  - Continued small sale old growth program for local use
  - A focus on the ongoing transition to second growth management
  - Focus on wildlife (thinning) and fish (red pipe) restoration activities with community partners
  - Beach fringe, floodplain, and stream buffers should be maintained and strengthened in the revised plan direction (special emphasis on 1000' beach buffers for both old and young growth stands)
  - Wildlife elevation corridors and stream buffers should be designed and maintained to ensure they are wind-firm
  - Community and Tribal input when determining location of timber harvest and forest restoration projects
  - Protection of community cultural sites with an emphasis on cultural cedar sites
- Rural community economy should be diversified by supporting:
  - Subsistence, which the Forest Plan should recognize as a major part of the rural economy and provide guidance to ensure its continuation

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<sup>1</sup> <https://www.govinfo.gov/content/pkg/FR-2026-02-18/pdf/2026-03197.pdf>

- Fishing, recreation, timber, outfitter guiding (with subsistence protections), mariculture, and small mills providing local communities with wood
- Tribal and community consultation in issuing permits or expanding commercial activities
- Special use permits and commercial special forest product permits should require local and tribal consultation to ensure that permitted activities do not have negative impacts on subsistence uses or access
- Recreation activities should:
  - Include more local community and Tribal input on permitting and projects to ensure that there are places for local use and that access to those areas are maintained
  - Make sure the management areas for high-use and low-use recreation are developed with the local community
  - Ensure that low-use recreation area infrastructure and access is maintained for local users
  - Hold subsistence hearings in the local affected communities prior to management actions being taken or any modifications to the boundary of community use areas or low use recreation areas
- Other concerns expressed by the Council are:
  - The continued yellow cedar decline
  - Clarification on the free use wood direction to increase ease of access
  - The need to include specific language addressing the Unit 2 wolf management plan

As previously stated in our last letter, this Council recognizes the importance of the Forest Plan and the role it plays in the management and administration of activities that may impact subsistence resources. We reiterate our request that, to the extent possible, the Forest Plan be more responsive to local input and that elements of the plan imposed by outside entities be limited. Lastly, the Council requests that Tongass National Forest leadership and planning staff make every effort to continue engagements with the Council throughout the planning process.

We appreciate the planning team's time in considering our concerns and suggestions regarding the NOI phase of the Forest Plan revision. We look forward to future opportunities to share our local subsistence knowledge and experience to help inform USDA Forest Service on this topic as they revise its Forest Plan.

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](mailto:deanna.perry@usda.gov) or (907) 209-7817.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald Hernandez", with a long, sweeping flourish extending to the right.

Don Hernandez  
Chair

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