

February 18, 2016

Dear Mr. Stewart,

Thank you for the opportunity to provide comments on the Proposed Tongass Land Management Plan and Draft Environmental Impact Statement. The Forest Service occupies a unique role as the manager of Southeast Alaska's unparalleled scenic and natural resources. The communities and economic opportunities of our region are intimately tied to the Tongass National Forest. Your management decisions will have wide-ranging impacts.

We are encouraged by the priority areas that the Agency identifies in the proposed Plan, including 3). *Recreation and Wilderness management*, 4). *Sustainable forest management for community stability and economic diversity* and 5). *Telling our story*. These are areas where tourism businesses have a lot to offer. As one of the leading sectors in Southeast's economy, we support significant year-round and seasonal employment, contributing to community stability and economic diversity. Contributing more than \$1 billion dollars to the region each year, tourism in S.E. Alaska depends on the landscape and wildlife that more than 1 million people come to experience. Our businesses are the gateway through which these people learn about the story of the Tongass. However, as funding for recreation programs continues to decline, we are concerned to see the Forest Service retreat from the very programs that support our jobs.

The Juneau Economic Development Council has convened the Visitor Product Cluster Working Group since 2011 in order to bring the members of the region's recreation and tourism industry operators and guides together with federal, state and local agencies, university faculty, trade associations, community leaders and other stakeholders committed to addressing industry needs, concerns and opportunities on a cooperative basis. The cluster process was implemented to help achieve the Secretary's vision of the Tongass transition to support diverse economies, recognizing that new jobs are most often created within existing robust economic sectors. From independent family-run businesses to the cruise ships that ply the Inside Passage, we have a shared interest in making sure our businesses have the opportunity to grow.

We would like to offer some general comments on the transition and the proposed Plan as well as some specific comments about issues that may directly impact some tourism businesses.

- **Tourism management is an important part of the region's economy and integral to the Purpose and Need and to addressing the Secretary's direction to make Forest management more ecologically, socially and economically sustainable and to consider diverse economies.**
  - The region has already transitioned.
    - DEIS 3-445/6 Natural Resource-based employment is majority tourism (56%).
    - The Tongass' wild landscape, abundant natural resources, distinctive communities, and scenic beauty draws visitors from around the world as well as provides for a healthy outdoor lifestyle for residents. The influx of visitors and the outdoor-lifestyle of the residents propels the tourism and recreation industry, one of southeast Alaska's strongest economic sectors and assets.



- Since 1990, visitation to southeast Alaska has quadrupled from 235,000 visitors in 1990 to over 1,000,000 visitors in the summer of 2014 with expectations for that number to continue to rise.
  - According to State of Alaska's Department of Commerce, statewide the tourism industry plays the most important role in southeast region where it accounts for 20 percent of the region's employment (10,800 jobs), contributes \$1.09 billion annually in visitor spending, and \$405 million in total annual labor income.
  - Tourism, recreation, and collaboration were identified as top regional strengths and opportunities in a recent survey of southeast Alaska's business leaders.
  - Southeast Alaska's recreational opportunities topped the list of regional benefits in a 2010 business climate survey with 72% of business leaders saying that the region's recreation resources are an asset to their business.
  - The plan fails to consider important social and economic metrics to measure outcomes.
    - The Forest Service should measure the jobs and economic contributions that recreation programs support in S.E. communities.
  - Tourism associations and businesses must be engaged as partners early in planning processes to build buy-in for projects.
  - The Forest Service should consider tourism as a significant economic opportunity for Tongass communities. Since the Secretary's memo, budgets for Recreation programs continue to be cut and the 2014 Leader's Intent for Recreation, Heritage and Wilderness Programs described the agency's intent to withdraw for the very programs that support thousands of jobs.
- **There are abundant tourism opportunities in the Tongass, but businesses need the Forest Service to prioritize our needs in order to realize these benefits. The DEIS recognizes the importance of access to the Tongass for tourism businesses but inadequately considers the saturation at recreation sites, impacts to recreation opportunities and places and the ecological, social and economic benefit to the region from expanding recreation opportunity.**
    - DEIS 3-347 Acknowledges that demand has exceeded supply for recreation places, noting that many sites are at capacity. Given the economic importance of tourism, the Plan's suggestion to potentially restrict permit access is troubling as tourism businesses seek sustainable ways to grow. The Forest Service should be investing in new opportunities for recreation that can increase economic opportunity for Tongass communities.
    - DEIS 3-339 We support preserving recreation opportunity and access in all of the Recreation Opportunity Spectrum. Both developed and primitive areas offer opportunity for existing use to continue and for business owners to develop new opportunities to take clients into the Forest. Prioritizing areas for recreation can provide a path for addressing the demand for recreation places that is currently outpacing supply (DEIS 3-347).
    - DEIS 3-330 We agree with the Forest Service that there are significant undeveloped potential for tourism opportunities in small communities. We look forward to working



with the Forest Service to develop economic opportunities that benefit all S.E. communities.

We thank you for your hard work to develop the Proposed Tongass Land Management Plan as well as forthcoming Shoreline II documents.

Sincerely,

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