

To: USDA Forest Service
Date: November 11, 2019
From: Mark Nelson
Re: Alaska Roadless Rule, Project #54511

Thank you for allowing me to provide my Objections to the Alaska Roadless Rule Environmental Impact Statement. I strongly object to the US Forest Service recommendation to adopt Alternative 6 of the six different Alternatives that were analyzed.

I do support Alternative 1 – No Action.

Alternative 6 results in the largest amount of land being opened for road development and logging. The 2001 Roadless Rule (36 CFR Part 294) is very descriptive in the reasons for protecting inventoried roadless areas and the features and functions that exist in those inventoried roadless areas.

The 2001 Roadless Rule was implemented for some of the following reasons:

Roadless Area Values and Characteristics

In an increasingly developed landscape, large unfragmented tracts of land become more important. Inventoried roadless areas provide clean drinking water and function as biological strongholds for populations of threatened and endangered species. They provide large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species. Inventoried roadless areas provide opportunities for dispersed outdoor recreation, opportunities that diminish as open space and natural settings are developed elsewhere. They also serve as bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research (FEIS Vol. 1, 1–1 to 1–4)

Fiscal Considerations

As USFS funding needs remain unmet, the cost of fixing deteriorating roads increases exponentially every year. Failure to maintain existing roads can also lead to erosion and water quality degradation and other environmental problems and potential threats to human safety. It makes little fiscal or environmental sense to build additional roads in inventoried roadless areas that have irretrievable values at risk when the agency is struggling to maintain its existing extensive road system (FEIS Vol. 1, 1–5 and 3–22). The National Forest System was founded more than 100 years ago to protect drinking water supplies and furnish a sustainable supply of timber. Neither objective is fully achievable given the present condition of the existing road system. The risks inherent in building new roads in presently roadless areas threaten environmental, social, and economic values.

Importance of Watershed Protection

Roads have long been recognized as one of the primary human-caused sources of soil and water disturbances in forested environments (FEIS Vol. 1, 3–44). Without the disturbance

caused by roads and associated activities, stream channels are more likely to function naturally (FEIS Vol. 1, 3–54).

Improving Ecosystem Health

Inventoried roadless areas provide large, relatively undisturbed blocks of important habitat for a variety of terrestrial and aquatic wildlife and plants, including hundreds of threatened, endangered, and sensitive species. In addition to their ecological contributions to healthy watersheds, many inventoried roadless areas function as biological strongholds and refuges for a number of species and play a key role in maintaining native plant and animal communities and biological diversity (FEIS Vol. 1, 3–123 to 3–124). Species richness and native biodiversity are more likely to be effectively conserved in larger undisturbed landscapes, such as inventoried roadless areas (FEIS Vol. 1, 3–142). Road construction, reconstruction, and timber harvesting activities can result in fragmentation of ecosystems, the introduction of non-native invasive species, and other adverse consequences to the health and integrity of inventoried roadless areas (FEIS Vol. 1, 3–128 to 3–136). The Department of Agriculture believes that the risks associated with certain development activities in inventoried roadless areas should be minimized and that these areas should be conserved for present and future generations.

Alternative 1 is the Alternative that is in alliance and compliant with the 2001 Roadless Rule. Alternative 6 is the Alternative that is the most divergent and non-compliant with the 2001 Roadless Rule.

Thank you for allowing me to submit my Objections to the Alaska Roadless Rule Environmental Impact Statement and the USFS recommendation to adopt Alternative 6.

Mark Nelson
Ripton, Vermont