

**COMMENTS**  
**DEIS—PROPOSED TONGASS EXEMPTION TO THE 2001 ROADLESS RULE**  
**REBECCA KNIGHT**  
**DEC. 15, 2019**

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Re: Proposed Alaska Roadless Rule Exemption

Submitted via email: [akroadlessrule@fs.fed.us](mailto:akroadlessrule@fs.fed.us)

Hello Mr. Tu:

Following are my comments to the Draft Environmental Impact Statement (DEIS) for the proposed full exemption of the Tongass National Forest from the 2001 Roadless Rule. I support Alternative 1 which would keep 2001 Roadless Rule intact on the Tongass. This process should be abandoned. But because your agency will ignore that request, a Supplemental DEIS must be prepared to address the deficiencies of the current DEIS, as noted in my comments as well as those of others.

I am a 44-year resident of the Petersburg and Kupreanof Island, AK area which is surrounded by the Tongass. I have used and enjoyed the fruits of our great forest during this time, including subsistence use of fish and game, solitude, recreation, and commercial fishing of salmon stocks arising from the creeks and rivers of the Tongass. I also, passively use it as a source for **carbon sequestration—the absolute most important function and service** of the Tongass, particularly in the face of our current and certain climate crisis.

Approval of the exemption would disregard the best available science (which your agency has repeatedly ignored), existing law, and overwhelming public sentiment—including the futures of our young people and children who are literally at the dawn of their lives and deserve far better from the “adults” who have been driving this process. All this, for the singular purpose of heavily

subsidized<sup>1</sup> road construction to access the last bastions of high volume old growth timber which will be largely exported in the round and at great profit to only a few people. This while the great forests of SE Alaska are reduced to a colonial style tree plantation, and while those who depend on the forest for values other than timber extraction will be greatly impacted.

### **Justifications in support of the proposed exemption ring hollow**

The Roadless Rule has been working just fine since it was enacted in 2001. While there have been a few red herrings floated around in order to undermine the Rule, they simply do not hold up to scrutiny. The first is that the proposed exemption is “about more than just access to timber” and that the Rule is “too restrictive” on the mining, energy, and community infrastructure sectors. This is patently false.

First, and as the Forest Service has acknowledged, (yet continue to discredit) “As of January 2018, 57 projects within roadless areas in Alaska have been submitted for review and all have been approved, most within a month of submission.”<sup>2</sup> Second, here-say and anecdotal accounts touted by Forest Service staff during the Petersburg, Nov. 7, 2019 public meeting as supposed evidence about how the Rule interferes with proposed projects, serve no credible basis for the purpose of sanctioning the proposed exemption. Third, if this false pretense were true, then Alaska’s other national forest, the Chugach, which has a very limited timber resource would have been included the proposed exemption.<sup>3</sup>

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<sup>1</sup> See Prepared Testimony of Autumn Hanna, Vice President, Taxpayers for Common Sense. Legislative Hearing: National Parks, Forests and Public Lands and Subcommittee United States House of Representatives Natural Resources Committee. November 13, 2019 <https://docs.house.gov/meetings/II/II10/20191113/110187/HHRG-116-II10-Wstate-HannaA-20191113.pdf> Ms. Hanna’s testimony was summarized from: *Cutting Our Losses: 20 Years of Money-Losing Timber Sales in the Tongass*. October 2019. <https://www.taxpayer.net/wp-content/uploads/2019/09/TCS-Cutting-Our-Losses-2019-.pdf>

<sup>2</sup> U.S. Forest Service, *Frequently Asked Questions Regarding Inventoried Roadless Areas* (Jan. 2018); U.S. Forest Service, *Question 8* (June 2018). [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd595403.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd595403.pdf)

<sup>3</sup> The DEIS (at 12) alleges that seemingly minor “administrative corrections” would be made for mapping errors, etc for Chugach NF boundaries, and are only “administrative in nature and does not have any environmental effects.” However, a more thorough inspection suggests that those changes could be far more than administrative or minor in nature and could ultimately have far reaching impacts, including Roadless area boundary changes allowing for road construction and industrial scale logging. In short, the Chugach would be effectively repealed from the Roadless Rule due to the Regional Forester exercising her/his authority under the proposed changes to the Roadless Rule on the Chugach.

In rambling statements before a Nov.13 Congressional subcommittee hearing,<sup>4</sup> Rep. Don Young alleged that the Rule has been, “disastrous for Alaskans and Southeast.” Again, if this were true then why has public sentiment throughout Alaska and the region, (as high as 100% in some communities), been overwhelmingly in favor of keeping the rule intact? SE Alaskans have moved on since the pulp mill days, while our delegation remains mired in the past.

Rep. Young also claimed that the Blue Lake dam expansion in Sitka was held up for ten years because of the Roadless Rule and that “you couldn’t cut a tree... couldn’t build a road.” *Mr Young is misinformed.* The Roadless Rule was NOT a hangup for the project. In fact, the Blue Lake road has been preexisting since the dam was first built in the late 1950s. The only delays in the project were the City's decision making process and securing the funding. As for the timber at the far end of the lake, it was not removed and instead, left flooded, simply because it was impractical to get to it due to steep slopes on both sides of the lake and not enough volume to make it worthwhile.

Another ruse perpetuated by industry supporters is that there is a shortage of access to firewood. Really? With the thousands of miles of road on the Tongass, the plentiful abandoned timber volume in local logging areas can supply decades of firewood, free-for-the taking, for local residents. Please remove any mention of this in future Roadless documents. It is a farce argument used to garner public support for the proposed exemption.

**The forest requires a long period of a rest from extractive exploitation and an era of genuine restoration which is not funded through additional timber removals.**

The genuine “needs” of the Tongass are for restoration and attending to the massive road maintenance backlog, not more of the same destructive practices which would create an even greater need for expensive restorative activities. For instance, approximately one-third of all locations where logging roads intersect streams on the Tongass fail to meet applicable standards for salmon migration.<sup>5</sup> That computes to approximately 1,100 culverts which are in need of repair forestwide. These aquatic organism passage (AOP) concerns must be remedied. Opening yet more intact forest for logging and road construction to benefit the timber industry is a misplaced concern, especially when your agency has placed fish passage repair needs on the back burner for decades.

Moreover, federal regulations [NFMA] wisely required that wildlife populations be “well distributed.” It is the forest fragmentation and cumulative loss of intact forest habitat that have hugely impacted these populations. With that mandate

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<sup>4</sup> See *Opening Statement of Rep. Don Young*. US Congress Natural Resources Committee. Subcommittee Hearing: NPFPL Oversight Hearing – November 13, 2019. [https://naturalresources.house.gov/hearings/npfpl-oversight-hearing\\_november-13-2019](https://naturalresources.house.gov/hearings/npfpl-oversight-hearing_november-13-2019)

<sup>5</sup> Southeast Alaska Fish Habitat Partnership. <https://seakfhp.org/2017/09/06/the-tongass-top-5/>

in mind, the framers of the Tongass Wildlife Conservation Strategy advised the Forest Service that the strategy alone, was insufficient to maintain viable, well-distributed populations of wildlife and would need a reasonable matrix in between [the small, medium, and large Habitat Conservation Areas, or “HCA’s” for short]. Roadless areas provide much of that matrix. Let me remind you that, “viable” wildlife populations are not the same as “hunnable” wildlife populations. This is especially important for those who rely on deer as a subsistence resource. Please address this important point in a revised DEIS.

Finally, as noted in recent testimony before Congress on Nov. 13,<sup>6</sup> following six decades of Tongass industrial logging and its resultant high-grading, the rarest and the most productive stands of contiguous large-tree old-growth have been eliminated by 66 percent.<sup>7</sup> These stands are the most valuable for fish and wildlife and historically covered under five percent of the Tongass. Some of the highest concentrations of old growth logging can be found on Prince of Wales Island and has resulted in a loss of 94 percent of the contiguous large-tree old-growth stands there since 1954.<sup>8</sup>

The overall result is that logging and road construction have left a mess on the Tongass, where some 65 salmon streams are in need of major restoration, and are estimated at a taxpayer funded cost of more than \$100 million.<sup>9</sup> Moreover, the road maintenance backlog on national forests in Alaska amounts to \$68 million. Shouldn’t our collective focus be on fixing the mess we have made and stand down from trashing our remaining pristine areas? Why must the American people suffer destruction on this scale to their public lands, particularly for a handful of heavily subsidized timber jobs?

Your agency alleges, “There would be no difference in cumulative effects among the Alaska Roadless Rule alternatives and these cumulative effects would be

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<sup>6</sup> US Congress Natural Resources Committee. Subcommittee Hearing: NPFPL Oversight Hearing – November 13, 2019. [https://naturalresources.house.gov/hearings/npfpl-oversight-hearing\\_november-13-2019](https://naturalresources.house.gov/hearings/npfpl-oversight-hearing_november-13-2019)

<sup>7</sup> Albert and Schoen, Use of Historic Logging Patterns to Identify Disproportionately Logged Ecosystems within Temperate Rainforests of Southeastern Alaska, 27 Conservation Biology at 779-780 (2013); <https://www.ncbi.nlm.nih.gov/pubmed/23866037> Albert, D. M., and J. W. Schoen, A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. <https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

<sup>8</sup> *Id.*

<sup>9</sup> USDA Forest Service, Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013, R10-MB-734 p.11. Nov. 2011. [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5339075.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5339075.pdf)

unchanged from those disclosed in the 2016 Forest Plan FEIS,”<sup>10</sup> however this is nothing more than spin. Opening vast, currently intact forest areas to extractive industry, which the timber industry is currently unable to access, WILL have a major addition to cumulative impacts and further forest fragmentation. The DEIS provided insufficient information to support its conclusion that there would be negligible to no cumulative effects, especially considering planned landscape scale clearcutting in southern and central southeast Alaska.

The reason your agency wants to open these areas to clearcutting and road construction is to prop up a timber industry which is literally out of a source of “economical” large tree, Tongass timber—and which *number-cooking agency appraisals can’t force onto the po\$itive side*. The industry has literally clearcut themselves out of a sustainable supply of timber, and with no conscience, believe they deserve access to the last remaining and valuable (ecologically and economically) old-growth. More so, exactly how does this square with a so-called “transition” away from old growth logging which your agent spent millions on and wasted the public’s time, in an attempt to greenwash the Tongass timber program?

**The Proposed Roadless Rule Exemption, top-down decision making violates NEPA, NFMA and ANILCA**

Most people view this proposed full Tongass exemption of the Rule to be the direct result of a brief visit by Alaska Governor Dunleavy with President Trump aboard Air Force One.<sup>11</sup> This resulted an almost immediate top-down edict from the Secretary of Agriculture, to fully exempt the Tongass from the Roadless Rule. The proposed exemption has also been heartily embraced by Senator Murkowski whose overarching goal is to transfer public timber into the hands of industry via any means possible, including privatization of our public lands. This proposed Roadless exemption is a major overreach and has had a consequence not envisioned by Murkowski, by directing nationwide and Congressional attention to the plight of the Tongass.

This top-down decision making violates the National Environmental Policy Act (NEPA), National Forest Management Act (NFMA) and the Alaska National Interest Conservation Act (ANILCA), and is particularly disrespectful to those who have used their precious personal time to prepare DEIS comments and testimony for the ANILCA 810 subsistence hearings for the proposed Roadless exemption, when a decision appears to have been already made. In short, established environmental analysis, required by these laws, is undermined

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<sup>10</sup> DEIS 3-118

<sup>11</sup> Alaska Daily News. Gov. Dunleavy talks with President Trump during Alaska refueling stop  
Author: [James Brooks](#) Updated: June 27 Published June 27. <https://www.adn.com/politics/2019/06/27/gov-dunleavy-talks-with-president-trump-during-alaska-refueling-stop/>

with top-down decisions that impact vast acres of public forest *prior* to or aside from (post-ROD) conducting proper analysis of foreseeable environmental impacts, especially cumulative impacts.

Moreover, this exemption effort is at the behest of and for the singular benefit of the timber industry, whose contribution is .07 percent to the regional economy—less the that of the regional arts sector. SE Alaskans have moved on and it is high time public agencies and politicians act for the overwhelming will of the people, not their corporate sycophants.

While it has been recognized that Democrat, Republican, and Independent governors have tried to reverse the Roadless Rule, Governor Knowles effort was a 2001 lawsuit that was unsuccessful and made in an entirely different and confused time—only four years after Alaska's last pulp mill closed. The current economic and environmental situation is much different. Alaskan's have moved on. Governor Walker's initial effort, now carried forward by Governor Dunleavy, was launched with great fanfare, but without having done any scoping within the region. Corruption of the public process escalated from there.

**Results the 2016 Forest Service Washington Office Activity Review Must be Disclosed and Considered in the Analysis**

Directly related to the push to gut the Rule—and absolutely NOT outside the scope of this Roadless exemption effort—are the results the high level 2016 Forest Service Washington Office Activity Review of the Big Thorne and Tonka Timber Sales.<sup>12</sup> The Forest Service has no business embarking on major timber sale projects or massive changes to Tongass land use designations until they can prove that the 18 formal findings of maladministration identified in the Review, some of which resulted in nearly four million dollars in lost stewardship and restoration jobs have been remedied. I believe those documented losses to be just the tip of the iceberg.

Among the Review's 18 formal findings were that timber sale administrators failed to ensure that logging prescriptions were being followed while the contractors cherrypicked cutting units, and ignored the NEPA prescriptions that had taken years to develop. Favoring the more valuable trees to log identified in the Activity Review and known as high-grading, is a practice that has been highly controversial on the Tongass for decades. It is in direct violation of the Tongass Timber Reform Act (TTRA), NEPA, and contract terms. So, what's the big deal? Not only do US taxpayers lose, but it also harms the composition, structure, and function of a stand, diminishes its biodiversity, and is detrimental to winter habitat, such as for Sitka black-tailed deer.

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<sup>12</sup> Washington Office Activity Review of Timber Sale Administration, Sale Preparation, Stewardship Contracting, NEPA, and Timber Theft Prevention. Region 10, June 12-20, 2016.

As evidenced by records requests, there has been no proof that the serious problems identified in the Activity Review have been corrected, despite agency assurances of oversight. For more than three years—longer than it took the Mueller report to complete its investigations—the Forest Service has kicked the can down the road and has hidden behind bureaucracy instead of coming clean. The extent of the coverup extends to this very day. During the November 7, 2019 Petersburg public meeting, Regional Forester Dave Schmid claimed that the results of a supposed audit of the Activity Review should be released within “two to four weeks.” Yet, as of today, six weeks later—there continues to be no indication of its release to the public. How long does the Forest Service intend to stonewall on this issue? If the problems have actually been addressed, then please provide verifiable evidence, now.

This is a coverup of monumental proportions and of local, regional, and national significance and is not an issue that will disappear. It is over-ripe for a formal, truly independent, investigation.

### **Subsistence Impacts**

Locally harvested Sitka black-tailed deer comprise about 95 percent of the red meat in my family’s diet as well as both of my sons, and their families for a total of 8 individuals. Our other protein needs come from local wild seafood including salmon, halibut, and shellfish. By late November every year, our goal is to have meat from four to six deer in our freezer to get us to the next season. This year, we ran out about a month ago, with only about four deer in the freezer from last November.

Community and traditional use areas for Petersburg/Kupreanof residents include **all** roadless portions within that area. Half of Petersburg’s CUA (total of 744,244 acres) is presently managed as roadless but under the proposed preferred Alternative 6, **no** acres will be managed as roadless. This is unacceptable.

Approximately 15 percent (111,065 acres) of the Petersburg CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains up to 23 percent (174,300 acres) for Alternative 6. This is also unacceptable and demonstrates utter disregard for the residents of my community who depend on local subsistence resources.

If the exemption is approved, which I strongly oppose, then I request that specific mitigation measures be employed to alleviate the effects of the proposed exemption on subsistence use of Petersburg’s/Kupreanof’s community use area. Specifically, I request that all the remaining productive, intact, old-growth habitat in Petersburg’s/Kupreanof’s community use area be included in those mitigation measures.

I support the No Action Alternative for a number of reasons, including the impact to my family's subsistence needs which will be negatively impacted under any action alternative.

**The Forest Service needs to prepare a revised DEIS that discloses major effects to deer populations inhabiting the proposed exempt IRAs**

The Forest Service has no business opening up areas for logging, which currently do not meet—whether naturally or as a result of logging— the TLRMP Standard and Guideline of supplying a habitat capability of 18 deer/square mile, in exchange for the exclusive benefit of 8 Alcan jobs and 40 Viking jobs. Moreover, in cases where habitat capability is below the 18 deer/mi.sq TLMP threshold, your agency shields itself behind the “where possible” clause to sanction yet more logging and roading rather than adopting a “no further harm” philosophy. This is unethical and misplaces the Forest Service's real intent of ensuring a handful of timber jobs to an antiquated industry, above the subsistence needs of ANILCA federally qualified individuals and communities.

This inconvenient truth can be no more evident than thru disclosures made in the Central Tongass Project (CTP) DEIS. For example, the CTP DEIS acknowledged that the deer model results show deer density already below the target of 18 deer/square mile in many project area Wildlife Analysis Areas (WAAs)<sup>13</sup> with further reductions expected due to additional timber removals.<sup>14</sup>:

*“The theoretical deer density calculated using the deer model is already well below the target of 18 deer/square mile in many WAAs in the project area, and additional timber harvest would further reduce it. Additional reductions in the deer habitat capability (and theoretical deer density) would further increase the risk that a severe winter or series of severe winters would have substantial detrimental impacts to the deer population, with similar effects to the wolf population, in the long term.”*

While the above is specific to the CTP, a discussion of a similar forestwide impact must be disclosed and considered in a revised Roadless DEIS. Please do not dismiss this request, by claiming that these impacts are already addressed at a Forest Plan level or will be in at an individual project level. The public

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<sup>13</sup> For your information, and because the Roadless FS staff seemed unfamiliar with the term during the Petersburg subsistence hearing: “Wildlife Analysis Areas (WAAs) are Forest Service land divisions that correspond to the “Minor Harvest Areas” used by the Alaska Department of Fish and Game (ADF&G). There are approximately 190 WAAs within the Tongass National Forest.

<sup>14</sup> CTP DEIS at at 3-149.



must be informed of what is at stake, *before* a decision is made. It can be assumed that most Tongass IRA POG acres *will* be felled (whether or not the logs on those acres are actually removed from the site) if the exemption is approved and therefore it is reasonable to disclose the impacts to subsistence use of deer, by alternative, prior to a decision.

To aid in this consideration, please include a map in the EIS which displays and identifies by ID numbers, all WAAs forestwide in relation to the Inventoried Roadless Areas, and provide color coding to display where 18 deer per mi. sq will not be attained—either naturally or through loss of habitat. Also, please include a list of all WAA's where they coincide or overlap the IRA areas. Also, please provide a table similar to the one included in the CTP DEIS<sup>15</sup> which displays calculations of current contributions to the deer habitat capability from NFS as well as non-NFS land, in order to accurately assess cumulative impacts of logging region-wide. This list should include habitat capability prior to logging and at stem exclusion. Any roadless acres where a habitat capability of 18 deer/sq. mi cannot be attained *must* be off-limits to any further logging as a mitigation measure for subsistence use of deer.

Please keep in mind that simply because habitat capability has been reduced to rock bottom in some areas, does not mean it should be exploited further as a sacrifice zone.

The Forest Service must take reasonable steps to ensure not just viable, but harvestable levels of wildlife populations, in particular - for deer. And this requires providing for wolves that also prey on deer. Now that much of the Tongass's high value deer winter range has been clearcut, what little habitat remains is vitally important including **all** deer habitat (low, mediocre, high and highest value winter range) as well as leave strips that serve as important elevational corridors for wildlife. In reality, these leave strips are seldom "left" but rather absorbed into new clearcuts after only a few years resulting in "creeping mega-cuts" that are wastelands for wildlife.

### **Demand for Deer is Much Greater than Harvest**

The demand for deer in SE Alaska is much greater than the harvest. There are many more designated tags issued than actually used, which is a statement to the big demand for deer and consequently the need to protect more habitat—not less.

For instance, my husband recently made a four-day hunt to Admiralty Island with two friends, where they normally experience good hunting success. However, they only harvested three deer. For Admiralty, this is likely a function of mild weather and their desire to not go too deep into Brown bear country.

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<sup>15</sup> CTP DEIS at p. 147. Table 37. Cumulative effects to deer density on NFS land.

They hoped to return when the snow brings the deer down to lower elevations, but have so far been unable. Regardless, it would have meant another expensive trip (fuel and groceries) across the big waters of Fredrick Sound, during a time of rough seas. Others who have done the same have lost their lives or nearly so while crossing.<sup>16</sup> My husband and sons have been overdue on several occasions, waiting out late Fall storms. For those without the means to get to areas with greater abundance, hunters often stop hunting altogether. This fact is substantiated in a study by Sigman and Doerr<sup>17</sup> who explained that many of the Petersburg deer hunters travel to GMU 4 (Admiralty), because hunter success is relatively good. They wrote:

*“the absence of liberal seasons and good deer hunting around immediate area of the communities has resulted in fewer active deer hunters especially with respect to the population size of these communities. Some hunters were able to travel to areas with good deer hunting while others were unable to or did not choose to because of such factors as increased cost, increased time involved, and problems associated with the weather. [many stopped hunting altogether] Deer hunting in the southeast corner of GMU 4 is about 55 miles from Petersburg and 90 miles from Wrangell by air and somewhat farther by boat and that explains why far fewer Wrangell hunters traveled to GMU 4.”*

ANILCA mandates that that wildlife resources in customary and traditional use areas like Petersburg and Kupreanof are available in close proximity to rural residents. Proceeding with a major reclassification of Tongass wild-lands for the singular benefit to industry, blatantly ignores that mandate.

During the last six to seven decades, there has been a significant loss of intact habitat Tongass-wide resulting in greatly diminished abundance for species like the Sitka black-tailed deer. This is particularly so in localized areas, for instance, in a portion of Game Management Unit 3 where hunters there have experienced the most restrictive deer hunting season in SE Alaska, including a 17-year closure following the initial industrial scale logging on local landscapes. The proposed Tongass Roadless exemption will continue to impact these local hunters disproportionately and will also cause further localized depletions over time. Although there has been a recent rebound in deer

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<sup>16</sup> Associated Press and Juneau Empire. Coast Guard quits search for Kake teen. Boy disappeared on hunting trip with father and another man, both of whose bodies have been found. Posted: Sunday, January 04, 2004. This is just one example.

<sup>17</sup> ADFG. Alaska Habitat Management Guide. Southeast Region. Fish and Wildlife Resources. Human Use of Pacific Herring, Shellfish and Selected Wildlife Species in Southeast Alaska, with an Overview of access for Non-Commercial Harvest of Fish and Wildlife. Doerr and Sigman. Technical Report 86-5- Your agency has this publication.

abundance locally, due to a few mild winters, and the local season has been somewhat liberalized this year, there is sure to be a return to harsh, deep snow winters which have the potential to greatly diminish deer abundance. Deer depend on the large tree, old growth stands to sustain them through deep snow winters. As wildlife experts have long acknowledged:

*“Periods of low deer abundance are usually preceded a series of severe winters and periods of high deer abundance preceded by mild winters.”<sup>18</sup>*

Just that simple.

I consider the public lands habitat that provides not only viable but huntable populations of deer for subsistence use to be among the highest of assets any public land can supply. Therefore, I request that there be no further loss of deer winter range (be it high, medium, or low) as will certainly happen under the proposed exemption and that you abandon this gutting of the Rule as the only way that goal can be accomplished.

**The cumulative economic loss of deer to subsistence hunters from logging and road construction, over time, must be disclosed**

The Forest Service should analyze and disclose the cumulative economic loss of deer to subsistence hunters, over time and from logging and road construction as part of the EIS’s cumulative effects economic analysis.

For instance, during the 1961 season and prior to large scale clearcutting, 1,922 deer were harvested from Unit 3 — during a time when deer habitat was largely intact. This computes to \$961,000 worth of meat in today’s dollars<sup>19</sup> and is likely a close estimate of today’s value had the habitat remained intact. This is a staggering loss of economic value, and far more precious than a sea of clearcuts and fragmented landscape that result from Viking and Alcan’s activities.

**DEIS figures are subterfuge**

According to the Forest Service,

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<sup>18</sup> Alaska’s Deer Have Their Ups and Downs. Harry Merriam. Petersburg Game Biologist. Alaska Fish and Game Trails. Nov-Dec. 1970

<sup>19</sup> Using an average of 50 lbs. of meat per deer. In today’s dollars for organic meat, \$10 per lb. is a conservative estimate of the value per lb. for Tongass “organic and free range” Sitka black-tailed deer.

*“The proposed rule would effectively bring only 185,000 acres (~2%) out of 9.2 million designated as inventoried roadless areas on the Tongass National Forest into the set of lands that may be considered for timber harvest. That modest addition of suitable timber lands would allow local managers greater flexibility in the selection and design of future timber sale areas. This improved flexibility could, in turn, improve the Forest Service’s ability to offer economic timber sales that better meet the needs of the timber industry and contribute to rural economies.”*

This description is an attempt to disguise the true impact of the proposed exemption, as if all Tongass acres are created the same.

No doubt maps of the proposed exemption acres have been carefully overlain on timber volume maps with input from industry, and with their target comprising the very “best of the rest” of the high volume stands of old growth remaining on the Tongass. This is outright cherry-picking. While the amount of acreage appears small relative to the overall size of Tongass National Forest, the public lands that the exemption seeks to obtain for logging include some of the region’s best remaining, richest and most biologically productive sites. Industry’s apparent “selections” can be compared to offering up a plate of caviar versus a plate of saltine crackers from other acres. In fact, one measure of this is the tree size on any given acre. These large-tree stands are not only disproportionately valuable economically for wood volume, but these same areas provide vital and increasingly scarce habitat for a variety of Tongass fish and wildlife including marten, goshawks, salmon, grouse, bears, wolves, and many other birds and wildlife. The resultant high-grading is a severe abuse of TTRA.

Large tree stands on the Tongass (i.e., identified as class 6 and 7) comprise just 3% of the National Forest land base. How many of those acres sought by industry for logging will eliminate remaining class 7 (biggest tree) stands on the Tongass? Please disclose in a revised DEIS. Such high-grading, will create disproportionate negative impacts on wildlife populations that depend on these stands for cover from deep winter snow (like deer) or for security cover along salmon stream (black and brown bears).

It is also important to note that USFS timber sales have entailed intensive high-grading of the highest habitat old growth – the timber industry has already removed nearly half of all the large-tree old growth forests from the Kupreanof and Mitkof Island region. This means that past logging has significantly reduced the current winter carrying capacity for deer. This proposal continues to target the most accessible and best remaining winter deer habitat on the Tongass– for example, all roadless acres in the Petersburg/ Kupreanof Community and Traditional Use area.

The prevalence of disproportionate removals of prime winter deer habitat is extreme throughout the Petersburg/Kupreanof community and traditional use area. Kupreanof and Mitkof Island both have experienced greater declines in winter deer habitat than most of the Tongass. Also, these areas have the second lowest amount of winter deer habitat protected in conservation reserves. Moreover, during the past decade, the Forest Service has concentrated its timber sale program in this area and on Prince of Wales Island. Simply put, this concentration of logging is unfair to subsistence users from Petersburg and Kupreanof. It also fails to heed ANILCA's mandate to ensure that wildlife resources in customary and traditional use areas are available in close proximity to rural residents.

With the best habitat gone and now with canopy closure occurring 25-45 years after logging, depending on location, what is occurring is a continual "succession debt" on the habitat. Following canopy closure, a virtual forage desert predominates, and now in the later decades, year-by-year the debt is being paid at a high price in terms of the amount of deer available to hunters, and wolves. Proposed restoration activities such as thinning, fail to protect the resource on a meaningful scale, nor will their effects be sustained long-term. Exacerbating the problem is "*consistent*" with the sound management of public lands and that it must be *necessarily* borne by local subsistence users.

As recently acknowledged by ADF&G:

*"During the next five to 10 years large tracts of previously logged areas will reach the closed canopy stem exclusion stage; large tracts of land will be converted to extremely poor deer habitat, and consequently, habitat capability and deer numbers are expected to decline."*<sup>20</sup>

Moreover, it is incorrect to assume that there is a linear, one-to-one relationship between this incremental loss in deer habitat capability and the number of deer that will be available to hunters. As Dr. Dave Person has pointed out many times—although the deer model assumes the system is linear, in reality the system is not—especially when predation is involved. The more the forest becomes fragmented, the more many of the remaining winter habitat patches become exponentially less effective. This non-linearity is due to isolation of some patches at that time of year, or a higher energy expenditure by deer to get to them and in some cases to use them; or the increased ability of bear (which prey heavily on fawns) and wolves to hunt them due to the fewer deer corridors between remaining forest stands and the fewer patches of winter habitat. This does not even take into consideration that the overall amount of winter habitat has already been greatly reduced. The deer model does not take

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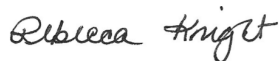
<sup>20</sup> ADFG, Sitka black-tailed deer profile. <http://www.adfg.alaska.gov/index.cfm?adfg=deer.printerfriendly>

these things into account nor does the agency's excuse. Also, the model does not take predation into account, which is a significant factor now.

Finally, as Taxpayers for Common Sense concluded, road building expenses to the USFS and losses to the taxpayer will significantly deepen under an approved roadless exemption: "In fact, USFS spending on roads in the Tongass made up more than 40 percent of all timber sale expenses from FY1999 to FY2018."<sup>21</sup> More profitable industries, on the other hand, such as tourism and commercial fishing, together generate more than \$2 billion in revenue annually and employ more than 10,000 people in the region.<sup>22</sup> These are the very industries which suffer great harm from timber removals. Why does the Forest Service only provide lip service to these important contributors to the regional economy?

I ask that the Forest Service abandon this proposed destructive and frivolous Tongass Roadless exemption. But, knowing full well you won't, I support Alternative 1 and ask that a revised EIS be prepared, which discloses and considers information lacking in the current DEIS, as detailed in my above comments as well as by the many others who have submitted comments to this proposed travesty.

Sincerely,



Rebecca Knight  
Petersburg, AK 99833

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<sup>21</sup> Taxpayers for Common Sense. Cutting Our Losses: 20 Years of Money-Losing Timber Sales in the Tongass. October 2019. <https://www.taxpayer.net/energy-natural-resources/cutting-our-losses-tongass-timber/>

<sup>22</sup> Southeast Conference, "Southeast Alaska's Economy" (2017), available at <http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20numbers%202017%20FINAL.pdf>.