

Comment on Draft Environmental Impact Statement - Rulemaking for Alaska Roadless Areas. Submitted 12/17/2019.

To whom it may concern:

My name is Mark Hieronymus, I live in Juneau, Alaska, and **I am writing today in support of Alternative 1 (No Action), keeping the roadless rule in place for the Tongass National Forest.**

Like many Southeast Alaskans, I depend on the healthy and productive rivers and wild fish of the Tongass National Forest (Tongass) for my food, recreation, and work. All told, fisheries and recreation jobs like mine account for \$486 million dollars in wages and earnings annually and provide 26% of all jobs in the region.¹ I have worked in the fisheries of Southeast Alaska for nearly 28 years now, and have made Juneau my home since 1995. I worked in the commercial salmon fisheries of Southeast Alaska as a deckhand, processor and business owner for almost 2 decades, and for the last 8 seasons I have been employed as a full-time fly-fishing guide here in Southeast Alaska, with a clientele that spans the globe. I work for an outfitter with a twenty-plus year history of guiding anglers on the rivers and beaches of the Tongass, and we are currently permitted for several dozen watersheds in Inventoried Roadless Areas. My job relies on these places and the intact fish and wildlife habitat they hold. Exempting the Tongass from the Roadless Rule puts my job (and thousands of other guide/outfitter and tourism jobs) at risk.

The Roadless Rulemaking Draft Environmental Impact Statement (DEIS) repeatedly states that roads pose the greatest risk to fish resources on the Tongass, but also states “Overall effects to fish habitat are expected to be negligible under all alternatives”.² In light of the fact that 33% of the bridges and culverts associated with Tongass roads currently fail to meet state fish passage standards,³ it is disingenuous to downplay the risk to fish habitat incurred by exempting the Tongass from the Roadless Rule, yet the DEIS goes to great lengths to do just that.

The Cost-Benefit Assessment (C-BA) of the preferred alternative estimates the lost revenue of the Tourism / Outfitter / Guide industry at \$319,000 annually.⁴ This loss is attributed to displacement by the timber industry which currently accounts for 0.61% of the annual employment and 0.8% of the annual earnings in Southeast Alaska.⁵ Why the United States Forest Service would choose to prop up an outdated and insignificant industry at the expense of the region’s vibrant and growing fisheries and tourism industries is not sufficiently explained in either the DEIS or C-BA, and does not align with the values of the majority of Southeast Alaskans as they relate to roadless areas,⁶ myself included.

The fish and recreation values of the Tongass are incredibly unique and growing harder to find in other parts of the world. I can attest to this firsthand, as I grew up in Washington State during a time of rapidly dwindling salmon runs - what was once a vibrant sport and commercial fishing economy was reduced to shambles, and one of the main drivers of the

decline was loss of spawning and rearing habitat for salmon. As this becomes more the case, the Tongass will continue to become more important as a place where wild salmon and trout can be sustainably fished and wild places can be enjoyed. Anglers from the lower 48 and beyond encountering lost and irretrievable fishing opportunities in their home waters now travel to Southeast Alaska in greater and growing numbers for the incredible fishing opportunities in natural, roadless settings still enjoyed here in the Tongass. Keeping the Roadless Rule in place on the Tongass and ensuring the management priorities are fish and recreation values is thus a wise investment in the future of the Tongass and will position Southeast Alaska for long-term, sustainable economic growth.

Thank you for the opportunity to comment.

Mark Hieronymus
Juneau, AK

Sources:

¹ Rain Coast Data, *Southeast Alaska by the Numbers 2019*, pg5

² United States Department of Agriculture, *Draft Environmental Impact Statement - Rulemaking for Alaska Roadless Areas* October 2019, pgs3-109 – 3-119

³ USFS, *2016-2017 Tongass National Forest Monitoring and Evaluation Report*, Streams and Fish Habitat – Fish Passage, pg3

⁴ Office of Management and Budget, *Alaska Roadless Rulemaking Regulatory Impact Assessment and Cost-Benefit Assessment*, 2019, pg5

⁵ Rain Coast Data, *Southeast Alaska by the Numbers 2019*, pg5

⁶ United States Forest Service, *Alaska Roadless Rule Scoping Period: Written Public Comment Summary*, 2019