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"Protecting the natural environment of the Tongass while supporting the development of sustainable communities in Southeast Alaska – Since 1967"

October 14, 2018

TO: Alaska Roadless Rule
USDA Forest Service, Alaska Region, Ecosystem Planning and Budget Staff
PO Box 21628
Juneau, AK 99802-1628

RE: Scoping Comments to be Considered for Analysis in the Alaska Roadless Rulemaking Process

Background: The 2001 Roadless Area Conservation Act ("roadless rule") was developed to ensure that large intact areas of ecological habitat remain on National Forest lands and that the cost and maintenance of road-building does not get so unwieldy for the USDA Forest Service that they do not have funding or capacity for other investments. Furthermore, the Roadless Rule ensures that the political influence of construction, engineering, and road building firms (and agency staff), does not get influential and "catered-to" to the point that the program is a "make-work" fund that gives outsized reward to a few well-connected entities or well-placed staff at the expense of other priorities or better investments.

The original Roadless Rule was a response to the construction of over 372,000 miles of logging roads[1] that enabled the clearcutting of old growth forests on National Forest Lands across the nation, and the realization that there was an acute loss of old growth forest acreage, as well as a response to the $8.4 billion in road maintenance backlog on these NFS lands. The Tongass was included in the 2001 roadless rule but it was protested and litigated by political leadership in Alaska based on a misguided characterization of the rule and the parochial interpretation of the vaporous "no-more-clause" in ANILCA. Lawsuits and legislation have brought the rule and back and forth many times since it was originally enacted. Many Sitkans and Southeast Alaskans have been outspoken in their desire to keep the original 2001 roadless rule in place. The small Alaska Native community of Kake has long been a litigant to keep the roadless rule in place on the Tongass.[2] The community is outspoken because they have seen the impacts of rapacious and short-sighted logging on tens of thousands of acres around their

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[1] https://www.fs.fed.us/eng/road_mgt/roadsummary.pdf, p5.
[2] https://cdn.ca9.uscourts.gov/datastore/opinions/2015/07/29/11-35517.pdf

communities which resulted in short-term profits for a limited number of well-connected individuals, at the long-term expense of the community's social and economic health. Indeed, it is observable that the patterns of logging in Southeast Alaska have closely followed a typical colonialism cycle in many of the rural communities of Southeast Alaska. In many cases, the colonizing entities have often made connections with select Native leaders and/or have set up colonially strategic systems or governance structures that obligated Native communities to quickly exploit the local resources on which they have long relied upon in exchange for the promise of entry into the "elite class" and/or the "haves" of the predominant capitalist system. ANCSA itself can be viewed as one of these colonially strategic systems that pitted Alaskan Natives against one another as some sought to develop and assimilate to a capitalist system, while others strove to preserve their traditional ways of life. This argument is expounded upon in Thomas Berger's *Village Journey: The Report of the Alaska Native Review Commission*[3]*,* as well as Vance Sander's article "A Tribal Advocate's Critique of Proposed ANCSA Amendments: Perpetuating a Broken Corporate Assimilationist Policy"[4].

Currently, in 2018, owing to pressure from the timber industry[5], the Alaska congressional delegation and the Alaska governor have petitioned the Trump administration to exempt the Tongass from the Roadless Rule. The exemption of the Tongass from the Roadless Rule seems to be based on the desire of the Alaska delegation and the Governor of the State of Alaska to open up more lands for old growth logging. There seems to be an especially specific desire for some of the last remaining areas of intact forest on Prince of Wales, Kuiu, Revilla, Gravina, and Kupreanof Islands. If more logging is allowed in these already heavily impacted areas, the ecological consequences will be massive; many of these landscapes are already highly fragmented due to past logging practices, multiple land swaps/exchanges and divergent land ownership and applicable regulations. On Prince of Wales Island, there are already severe impacts to the Sitka Black-Tailed Deer and Alexander Archipelago wolf populations because of the lost habitat that previous clearcut logging has already created. Those places can't take much more logging of old growth, habitat fragmentation, or human impact before wildlife numbers get to a precipitous point and there is localized loss of wildlife populations on whole islands or landscapes.

This document is submitted to the Forest Service as scoping comments for the Alaska Roadless Rule-making process that the Forest Service is currently undertaking. These comments are written by the Sitka Conservation Society and represent the Board of Directors of the Society and its membership of over 1000 people who use, depend on, and care about the Tongass National Forest. In these comments, we will speak to some of

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[3] Thomas Berger, A Village Journey: The Report of the Alaska Native Review Commission, New York: Hill and Wang (1985).

[4] Vance A. Sanders, A Tribal Advocate's Critique of Proposed ANCSA Amendments: Perpetuating A Broken Corporate Assimilationist Policy, 33 *Alaska Law Review* 303-314 (2016). Available at: http://scholarship.law.duke.edu/alr/vol33/iss2/7

[5] Although the State Representative of the process, DNR employee Kyle Moselle, denies that the timber industry is behind this push for exemption, the APA petition from DNR Commissioner itself indicates otherwise. See: language referring to 'revitalize' 'forest products industry'. https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4406959.pdf

the big-picture policy concerns related to the management direction, investments, and staffing of the Tongass National Forest as a means to inform the agency on the local input of Tongass Management. We urge the agency to consider these inputs, as well as Appendix #7 as a means to take the "pulse" of local communities, small businesses, and user groups on the Tongass[6]. We understand that the agency has heard the voices of Alaska's political leadership and is responsive to their concerns, but we would like to offer a perspective that differs from many of those political voices. There is an undeniable feeling in Southeast Alaska that these voices most often represent a select few individuals, businesses, or corporations rather than the actual community members and local economy[7]. We would offer evidence of that misrepresentation both the commentary included in Appendix #7, where the official position of the State is in direct conflict with the vocal majority of concerned Southeast Alaska citizens, as well as in the current fiscal situation in Alaska, where political leadership has been unwilling or unable to confront a new fiscal reality and has shown itself beholden and/or corrupted by the influence of special interests (including oil and gas corporations). Further evidence of the minimization of local voices is the inability of political leadership to take policy action on issues of climate change because of the corrupting influence of oil and gas corporations - even though the changing climate and warming oceans pose an existential threat to Alaska, specifically to its fisheries, infrastructure, traditional cultures, livelihoods, and land/water connections.

The concerns we outline will be followed by specific places where we would like to see changes in the roadless rule and/or maintain the current roadless status under a new Alaska roadless rule. This section includes specific things we would like to see allowed and not allowed in those areas.

Finally**,** we ask that the Forest Service perform a full analysis on these concerns as part of the current Alaska Roadless Rule NEPA evaluation process. All of these concerns are within the scope of what absolutely must be analyzed within this process to give it full legal credibility and due diligence in agency responsibility as part of adherence to agency laws and mandates.

The following is a list of the issues that we would request that the USDA Forest Service conduct a thorough analysis of in this Alaska-specific roadless rule-making process:

1. **Hydropower projects:** We would request that the Forest Service prepare a full report as part of the Alaska Roadless Rule-making process of all hydropower projects applied for on Tongass National Forest Lands, and which ones were approved with a specific focus on if these are in or out of inventoried roadless areas. We would also like to know how

[6] To this end, we have also included audio files from U.S.F.S public scoping meetings in Sitka, Tenakee Springs, Anchorage, and Washington DC; a transcript of the audio taken in Tenakee Springs, and links to several media articles that reported on the public meetings conducted by the Forest Service throughout 19 communities in Southeast. These audio, transcript, and associated media clearly demonstrate a strong preference towards maintaining the Roadless Rule on the Tongass, despite assertions from political leadership that communities are most heavily concerned about timber jobs and community connectivity.
[7] Ibid.

much energy is generated by hydropower projects on the Tongass in roadless areas, how many permits have been denied (in and out of roadless areas), how many pending requests for hydro projects are there (in and out of roadless areas), and what and where the anticipated projects for hydropower in roadless area are. We would like the analysis to include a detailed list with the explained rationale of what conditions have been put on hydro projects conducted in roadless areas. We would like the Forest Service to use that analysis to outline what the best practises, standard operating procedures, and/or conditions will be for future hydro development projects on National Forest lands in Alaska as a means of sending a clear message to municipalities and utilities companies of what the agency will be looking for in a potential hydro-development projects on USFS lands, what conditions will likely be put on projects, and what the general prioritization framework the Forest Service will follow for hydro-projects. This will address concerns of uncertainty in the development projects permitting process and give hydropower developers more certainty in regards to the success of their permitting applications. For example, we are sure that the Forest Service will only permit hydro-projects on lakes/streams/rivers that are above salmon migration barriers and that this is a mandatory condition; as such, it should be stated for clarity for any potential permit-seeking entity. Likewise, we assume that the Forest Service would invest limited special-use-permitting staff time into projects that served to get communities off diesel generation over projects that were speculative endeavors by private businesses with an intention to re-sell and/or export power to transboundary mines or grids; as this is the case, it should be stated so that there is no uncertainty or challenge by any permit-seeking entities.

2. **Old Growth timber inventory:** We would request that the roadless rule review for Alaska include an inventory of old growth timber that is desired by or meets currently operating mills' needs. This analysis should focus specifically on the timber that the industry is utilizing from recent sales (not timber that is part of a contract but left in the stand or at the yarding area). It is imperative for the agency to clearly inventory and show what the volume of economically viable old growth timber remaining on the Tongass is and what the reasonable volume that could be put up for sale is. We specifically want to know <u>how much economical old growth remains on the Tongass</u> (in roadless areas and in roaded areas). We want to know the specific volumes of timber that will meet industry needs and what is available on the ground. We know that many of the most recent sales have received no bids (e.g. Kuiu Timber sale) because the sales were not economically feasible for mills to buy, even after significant amounts of investment from the Forest Service for roadbuilding[8]. This statement is corroborated by even the owner of Viking Mill on POW, Owen Graham, who stated "If somebody did buy

[8] See Elizabeth Jenkins, Alaska Public Radio, "No Bids on Controversial Old Growth TImber Sale… Again" (June 6 2018).
https://www.alaskapublic.org/2018/06/06/no-bids-on-controversial-old-growth-timber-sale-again/

it [the Kuiu sale], I hope they could make it work," Graham said. "But I'd be surprised. It looks like a loser to me."[9]

a. It is no longer an option to use imprecise calculus of timber volume and stringing along businesses, political leaders, and development NGOs to believe that they can continue logging at historic levels forever without limit. It is no longer an option to cite total acreage on the Tongass and assume that it must include some economic timber even though it is clear to anyone who has lived on the Tongass that resources-- including timber-- are concentrated in specific and limited places, and that the timber industry has already logged the most productive and valuable stands (leaving future generations bereft of opportunities for a viable timber sector).

3. **Young Growth inventory follow-up analysis:** With the results of the recent YG inventory completed, we would request an analysis of the rotation period and growth model (how long does it take for trees to grow back to merchantable age) for timber based on landscape variables such as soil, elevation, aspect, etc. We would request this analysis to extrapolate on a rotation period model for stands in roadless area as a means for the public and the Forest Service to judge which areas are the most intelligent to log. We suspect that the stands remaining in roadless areas are rather unproductive and that rotation periods are quite long compared to stands that were logged earlier in the history of Tongass logging. If it is clear that stands in some of these roadless areas would take 100 to 150 years until they reach merchantable timber again, it may be deemed short-sighted and unintelligent to log them in the first place. We would request that the Forest Service make clear that it will not log stands of trees that would have a rotation period to reach merchantable size of greater than 100 years as there are plenty of places in the world with shorter rotation periods and intact forest has a higher value in carbon sequestration, wildlife, intact habitat, and intrinsic value.

4. **Ecological value:** The pulp mills and subsequent logging took the most ecologically valuable stands of old growth forest from the Tongass. It has always been the practise of the first loggers into a landscape-- and subsequent operators-- to always log the best first for highest profits. In most cases, this also meant that the most ecologically valuable stands (especially riparian areas directly adjacent to streambeds) were logged early and rapaciously because lands with high ecological values and high value timber stands are almost directly correlated with each other. We would request that the Forest Service analyze the total amount of high volume stands of forest (which most often correlate with the most valuable ecological stands of timber) that were logged across the Tongass and compare that with the total amount of high volume stands of timber that were historically in place on the Tongass before logging began. We would request that the analysis further show the amount of high volume stands of forest that are currently in

[9] Elizabeth Jenkins, KTOO, "This Old growth timber sale didn't sell the last time, can it attract a buyer now?" (May 24, 2018)
(https://www.ktoo.org/2018/05/24/this-old-growth-timber-didnt-sell-last-time-can-it-attract-a-buyer-now/

roadless areas, where those are on the landscape, and what percentage of the original extent of high volume stands those represent. We urge the Forest Service to utilize the Audubon-TNC Landscape Conservation Assessment in their analysis[10].

a. **Impact on salmon, deer, wolves, bear species:** We request that the Forest Service perform an analysis on the historic impact of logging to the five species of salmon, deer, wolves, indicator bird species (goshawk and murrelet) and bear on the Tongass and outline the role that the Roadless rule has in protecting the habitat that these species depend on.
b. We would request that the Forest Service analyze and outline the role that Roadless areas on the Tongass play in fulfilling the old growth habitat and wildlife conservation strategy in the current Tongass Land Management Plan.

5. **Climate**: It has been reported that the remaining old growth stands contribute extensively to the sequestration of carbon in the Tongass, sequestering an amount of carbon that is equal to 8% of emissions of the US[11]. We would request that the Forest Service fully analyze how much carbon is sequestered by forests in roadless areas and the national and global implications of that sequestration, including a quantitative analysis of how much money is saved in terms of ecosystem services provided. The Forest Service should also produce a report on opportunities/possibilities available for the Forest Service to apply the Tongass National Forest for participation in state, national, and/or international carbon credit programs, and conduct a quantitative analysis putting a value on the current amount of carbon stored in the Tongass that addresses the social, environmental, and economic value of carbon. Carbon sequestration opportunities and their economic benefits should be analyzed in range of alternatives explored during the Alaska-Specific Roadless Rulemaking Process as it is not unlikely that putting these untouched forests into a carbon market would reveal larger dividends for smaller payoffs than federal subsidies for roadbuilding and the resulting timber receipts
    a. We would request that the Forest Service research the role of sclerotium fungal bodies ('black ball sclerotium') in old growth soils and their role in carbon sequestration on the Tongass, in addition to the potential impact of logging and roadbuilding on these processes[12].
    b. Consider the the Working Group III's contributions to the IPCC's Fifth Assessment Report (AR5) (2018) and how a change in land use would affect the ability of the U.S. to mitigate and address the effects of climate change, especially in regards to the following statements:

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[10] TNC's A Conservation Assessment and Resource Synthesis for the coastal Forests and Mountains Ecoregion in the Tongass National Forest and Southeast Alaska.https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx

[11] U.S. Forest Service, "Addressing Climate Change on the Tongass" https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5252603.pdf

[12] See K. Obase, G. Douhan, Y. Matsuda, M. Smith, "Culturable fungal assemblages growing within *Cenococcum* sclerotia in forest soils" (2014) at https://academic.oup.com/femsec/article/90/3/708/540146

i. **"**Infrastructure developments and long-lived products that lock societies into GHG-intensive emissions pathways may be difficult or very costly to change, reinforcing the importance of early action for ambitious mitigation"[13]

ii. The AFOLU (Agriculture, Forestry and Other Land Use (AFOLU) sector accounts for about a quarter (~10–12 GtCO2eq/yr) of net anthropogenic GHG emissions mainly from deforestation, agricultural emissions from soil and nutrient management and livestock[14].

c. The large, undeveloped swathes of forest in the Tongass make it an ideal place to research effects of climate change on a multitude of different landscapes. Due to this unique characteristic and landscape, we recommend:

i. Given that the US Forest Service has referred to the Tongass as "one of the most dynamic environments relative to the global carbon cycle"[15], dissolving nearly 9x the amount of carbon in Tongass streams than the Amazon River basin (per unit area); research must be conducted to better quantify the amount of carbon stored in the forest, which landscapes provide the most effective carbon storage, and the social, ecological, and economic impacts that would result from altering this natural landscape with activities that could contribute to carbon emissions.

ii. The FS should conduct research examining how global warming effects extreme weather events, especially increasing periods of dryness with little to no precipitation that we have seen on the Tongass, with September 2018 being the driest September on record[16]

1. This increasingly erratic precipitation is contributing to a lack of necessary snowfall in the winter to build up snowpacks that provide critical sources of water flow and oxygen to streams and salmon habitat during summer months.

d. **Costs:** We would request that the Forest Service analyze and present the costs of road building for timber harvest in roadless areas. It is clear from past projects that roadbuilding on the Tongass is extremely expensive. A good example is the Kuiu Timber sale, referred to above, where the Forest Service spent over $3 million dollars building roads to prepare for the timber sale. When the Kuiu timber sale was offered for bids (subsequent to the road construction provided to access timber stands), it received no bids. Instead, the sale is being litigated for an expired NEPA process (adding further burden to taxpayers subsidization of the timber sale, as American citizens foot the bill for the Forest Service's legal expenses)[17]. We would request that the Forest Service present a figure in their

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[13] https://www.ipcc.ch/pdf/assessment-report/ar5/wg3/ipcc_wg3_ar5_summary-for-policymakers.pdf, 24
[14] https://www.ipcc.ch/pdf/assessment-report/ar5/wg3/ipcc_wg3_ar5_summary-for-policymakers.pdf, p26
[15] https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5299764.pdf
[16] https://www.kfsk.org/2018/09/20/southeasts-dry-weather-brings-record-highs-and-lows/
[17] See the Kuiu Timber Sale Complaint
https://www.biologicaldiversity.org/programs/public_lands/forests/pdfs/Kuiu-Complaint-5-16-18.pdf

draft environmental impact statement analysis of costs for road-building in a costs/MMBF of timber to access roadless areas in various working circles throughout the Tongass. We would request that the analysis also outline and present the current backlog and estimated costs for repairing/replacing bridges and culverts that block fish streams and fish passage. We would also request that the Forest Service analyze the current maintenance backlog for existing 5,000 miles of road on the Tongass and provide an estimate of the costs of yearly maintenance across the Forest to keep road maintained and usable.

e. We suggest that the Forest Service consider the attached assessment by Taxpayers for Common Sense of the monetary losses from below-cost timber sales in the Tongass National Forest included in Appendix #7.

6. **Socio-economic quantitative analysis of effects on food security (subsistence harvesting):** We would request that the Forest Service analyze the impacts of clearcut logging on deer populations in rural communities -- especially Hoonah, Kake, and the communities on Prince of Wales Island and outline how future logging will affect Sitka blacktail deer populations and the socio-economic impact on those communities due to the high importance of Sitka blacktail deer as a subsistence food. This analysis should include consideration of the fact that development that negatively affects ecological habitat health in one area will lead to affected communities' increased reliance on subsistence harvesting in other areas. The Forest Service should also conduct a study on the socio-economic impact of subsistence hunting and fishing for Southeast residents, and the potential knock-on effects of degraded fish and wildlife populations due to forest fragmentation.

7. **Impact on regional economic drivers:** We would request that the Forest Service conduct a comparative analysis of regional revenue and employment derived from commercial fishing and visitor industries in comparison to regional revenue/employment of the timber industry, and include this analysis for publication in the DEIS. The Tongass is the premier salmon-producing forest in the nation and is popular with visitors globally. The salmon runs and the sport, commercial, and subsistence fishing they support alone contribute over $1 billion annually to the regional economy, while accounting for 11% of Southeast Alaska's employment[18]. Out of state visitors coming to the region bring in another $1 billion annually in economic activity, providing the basis for around 17% of in-region jobs[19]. With both of these economic sectors expected to continue to grow in the future, the Forest Service should be doing a cost-benefit analysis to provide for the

[18] TCW Economics, Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska, prepared for Trout Unlimited Alaska 16 (July 2010), available at http://www.tu.org/sites/www.tu.org/files/documents/EconReportFull.pdf.

[19] Rain Coast Data, Southeast Alaska by the Numbers 2017, prepared for Southeast Conference 4 (Sep 2017). available at http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20numbers%202017%20FINAL.pdf.

proper investments in the economic future of the region. These industries depend on healthy watersheds, intact fish and wildlife habitat and populations, and the natural beauty of the Tongass National Forest that the current 2001 Roadless Rule is functioning to protect.

8. **Saltwater Access Feasibility Study**: The Forest Service should conduct a feasibility and economic analysis of road travel versus marine vessel travel within the Tongass National Forest for community transport / visitor industry purposes. This analysis will demonstrate that roadbuilding is a cost-prohibitive venture for Southeast and encourage the State to invest in increased maritime transportation opportunities.

SPECIFIC GEOGRAPHICAL REFERENCES

During the community meeting held in Ketchikan as part of the Forest Service scoping process, Forest Service regional economist Dr. Nicole Grewe expressed that in order to be most helpful, comments should identify specific geographic areas and provide a narrative, or recommendation for which activities should be allowed in roadless areas and which activities should be prohibited. The meeting was reported on by KRBD[20] in Ketchikan and Dr. Grewe was specifically quoted as saying "So with any rezone or land reallocation, there's a geography component – where, how big, what are the boundaries, what's most important to you, which piece of land? And for those places that are important to you, what type of activities should be allowed in that area, and what should not be allowed?"

With that in mind, we would like to highlight the below areas in the **Sitka Community Use Area**[21]. The Sitka Community Use Area was first described in a 1997 ballot initiative that attempted to prohibit clearcutting on areas that Sitkans depend on and utilize for fishing, recreation, hunting, and to support their economic livelihoods[22]. The population of Sitka was then surveyed to determine restoration priorities in the Sitka Community Use Area in a 2013 Watershed Restoration Community Survey. These areas have also been identified and mapped by previous Forest Plans, including the 2008 Tongass Land and Resource Management Plan FEIS[23]

1. **Fish Bay**: Located on the northern part of Baranof Island, Fish Bay is recognized for its ecological importance. It is a Tongass77 watershed and one of the TNC-Audubon ecological priority areas. It is further recognized by the Forest Service for its ecological

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[20] See Maria Dudzak, "Citizens express concerns/hopes about Roadless Rule changes" (September 19 2018). https://www.krbd.org/2018/09/19/80197/

[21] See Appendix 3: 1997 Proposition 1 Ballot Initiative; Sitka Community Use Area Watershed Restoration Priority Survey

[22] Note that this 1997 ballot initiative to prohibit clearcutting in SCUA failed by only 1%.

[23] See the USFS 2008 Tongass Land and Resource Management Plan FEIS, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5367433.pdf, page 42

importance as an old growth reserve. Fish Bay is part of the North Baranof Large Inventoried Roadless Areas. Fish Bay is used by Sitka residents for subsistence harvest activities (salmon, deer, marine mammals, waterfowl), as well as guided and personal sport hunting and fishing. The bay produces prodigious amounts of salmon (as per its name) and is also an important area for commercial crabbing. This area has been logged in the past but the road system here has been dismantled due to the poor construction and lack of attention at the time it was logged to critical watershed features such as stream connectivity, sensitivity of highlight erodible landforms (valley bottoms), anadromous fish passage, riparian areas, stream sensitivity to machinery operation, and best practices for operations on temperate rainforest soils (they really ripped it up in there)[24]. Given the ecological importance, the high use of this area by Sitkans, the fish production of this watershed, the existing commercial uses, and the sensitivity of this habitat, we would request that the area be designated as roadless under a new Alaska Roadless Rule. We recommend that activities allowed include commercial Special Use Permits for guided hunting and fishing, active watershed restoration measures, upland habitat restoration (including thinning) as needed, public use cabins, recreational trails, and float plane access infrastructure, and other Special Use Permits that are allowed in the Remote and Semi-Remote recreation LUDs. We would recommend that prohibited activities for this area include timber harvest, road construction, energy and mining development.

i. **Geographical Boundaries**: We would make the above recommendations for all of the Fish Bay watershed and all of the drainages that feed into Fish Bay from Peril Strait south. This includes VCUs: 2870, 2880, 2890, 2790, 2780.

2. **Ushk Bay and Poison Cove, Chichagof Island/Hoonah Sound:** The areas in the Southeast portion of West Chichagof which include Ushk Bay, Poison Cove, and drainages on the west side of Hoonah sound are included in the large inventoried roadless area (2003 inventory) named Hoonah Sound. A portion of these areas are in LUDII designation while other parts are timber/development LUDs. This area is part of the original Sitka Conservation Society proposal for the West Chichagof Wilderness Area [25]. We believe, as we proposed in 1967 and have been advocating for ever since, that these areas should be part of the West Chichagof Wilderness Area. For all the reasons outlined in our original Wilderness Proposal (attached in Appendix #2), we would request that in this roadless process, the Forest Service designate this area as a Wilderness Study area and do a full evaluation of the Wilderness characteristics of this area, and evaluate if the area would be a good candidate for Wilderness designation. We would request that following this evaluation, the Forest Service take the first opportunity when

[24] Refer to a Bob Christensen and Richard Carstensen, “Field Assessment and Landscape analysis of Northern Baranof Island” conducted for the Sitka Consevation Society in 2007 https://www.discoverysoutheast.org/wp-content/uploads/2016/02/northernbaranoff-1.pdf

[25] See Appendix 2 for associated materials.

the current plan (2016 TLMP) is amended to reclassify the LUDs for this area to Wilderness study area and/or LUDII status for the complete area. For the current Roadless process, we would request that the Forest Service designate this area as roadless under any new Alaska Roadless Rule and that the specific uses of this area be limited to Special Use Permits for commercial guiding, active habitat restoration as needed (including upland thinning if needed), watershed restoration as needed, recreational cabins, and other uses as per Remote and Semi-Remote recreational LUDs. We would request that commercial timber harvest not be allowed in this area, nor road construction, nor powerlines or energy (including hydropower or geothermal) projects. This area continues to be important for Sitkans for subsistence harvest and gathering, sport and guided fishing and hunting, and recreation and visitor industry use. The area is listed as a Tongass 77 top salmon producing watershed and is also in the Audubon/TNC ecological priority areas.

   a. **Area**: The areas we refer to are included in the VCUs 2790, 2810. A detailed map of the area as proposed as Wilderness by the Sitka Conservation Society is included in Appendix 2.

3. **Kruzof Island**--- **Southern Portion (VCU 3080)**. This area should be designated as roadless under the new Alaska Roadless Rule for its outstanding geological unique features including volcanoes, craters, lava flows, columnar basalt, petrified-by-ash trees [26], lava coastline, black sand beaches, forested "drainage fingers", muskeg systems, and coastal forests. The only activities that should be allowed for this area are guided visits (hunting, fishing, sightseeing, birdwatching, hiking, etc.), trail construction and maintenance, and recreational cabins. There should be no timber harvest, road construction, powerline corridors, mining, inholdings, utility corridors, energy infrastructure development or any other industrial or resource-extractive development allowed in this area.
   a. **Area**: This area includes all of the land that is currently classified as Mt Edgecumbe Special Interest Area due to its unique geological features.

4. **Kruzof Island - Northern and Middle Portion (VCUs 3060, 3030, 3040, 3050, 3070, 3090)** : The area of Kruzof Island which is North of the Mud-Bay Road System up to Salisbury Sound-- with the **exemption of the Eagle River/Gilmore Bay Road system** -- should be considered Roadless and maintained in the same current status under the Alaska Roadless Rule. These areas are heavily used by Sitkans for recreation, subsistence harvest/gathering, hunting, fishing, and some guided use. Use is especially concentrated for recreation and subsistence in the areas around Sukoi Inlet, the Northern Bays of Kruzof Island, the corridor around the trail to Sea Lion Cove, the

[26] https://www.usda.gov/media/blog/2014/03/07/buried-forest-alaskas-kruzof-island-window-past; https://www.alaskapublic.org/2013/11/04/tree-buried-by-volcanic-eruption-could-reveal-seismic-secrets/)

watershed above Kalinin Bay, the upper slopes surrounding the Eagle River-Gilmore Bay Road system, and surrounding Sea Lion Cove. All of this area is also very important ecologically and contains high density deer and bear populations. We would request that the Forest Service maintain this area as roadless. The uses that should be allowed in this area should be consistent with remote and semi-remote recreation. Uses should include special use permits for commercial hunting, fishing, and sightseeing; trails and cabins and appropriate recreation investments. Old growth timber harvest, mining, road construction, or powerline corridors, and energy development should not be permitted in this area.

5. **Redoubt Valley (VCUs 3500, 3510, 3210, 3490).** The inventoried roadless area given the name Redoubt is a large inventoried roadless area that includes lands from Salmon Lake Valley to Povorotni Point, to South of Redoubt Lake. This area has outstanding natural features including lakes, estuaries, salt-chucks, wetlands, salmon runs, waterfalls, trails, forests, mountain ridges, cliffs, and muskeg systems. This area is heavily utilized by Sitkans for a wide range of activities. This is one of the most important areas for sightseeing and wildlife tours in the Sitka Sound and supports a number of small tourism operators. It is also very important area for subsistence fisheries (especially Salmon lake and Redoubt lake). There are a number of formal and informal trails in this area. There is a significant visitor industry use of this area, as the Redoubt weir is one of the best places to see brown bears during the summer months. There is extensive subsistence and sport hunting in this area, and it is the most frequented sockeye subsistence spot among Sitkans in the Sitka Community Use Area. This area is in the viewshed of Sitka and is seen and featured in multiple publications and publicity materials for marketing Sitka-based businesses and for marketing and promotion. For these reasons and many others that can only be captured pulling snapshots from the memories of thousands of Sitkans who have spent times in this area and have personal and family stories and legends, freezers full of food, and close encounters with wildlife and bliss, we would request that this area be left in the roadless status that it currently is. No old growth timber harvest should be allowed in this area, no roads should be built in this area (especially within the Salmon lake watershed), no powerlines should be built through this area, no mining should occur in this area, and no hydroelectric facilities should be built in the salmon-producing lakes of this area. The activities that should be allowed in this area include: management for salmon production, commercial guided use, management for subsistence resources (including fisheries enhancement on Redoubt Lake), activities to support hatcheries (including in the Salmon Lake outflow river), habitat restoration where needed, and fisheries monitoring and research. We would further recommend that in areas where large scale timber harvest of the type where whole valleys were cut without leave strips or stream buffers (such as is the case of Kizuchia Creek Valley and Camp Coogan Valley), the Forest Service conduct active habitat restoration efforts for upland habitat, salmon habitat, and overall watershed conditions, and that any future timber harvest consist of treatments that do not replicate

the habitat damage that past timber harvest created, but rather are restorative treatments until these areas return to old growth habitat conditions.

a. **Area**: This area is listed by the Forest Service as a large named inventoried roadless area named Redoubt in the 2003 database.

6. **Sitka Urban** (as named in the Large Inventoried Roadless Areas of 2003) (VCUs 2990, 3010, 3130, 3120, 3110, 3180, 3250, 3240).

a. The Sitka Urban roadless area is characterized by wide-ranging feasible access from the existing municipal road system. This areas is thus heavily utilized by locals and visitors wishing to see wildlife, go fishing, and recreating close to home. These areas should be managed to maintain their roadless characteristics and enhance their biological and ecological productivity, which provides many socio-economic benefits for Sitkans.

b. **Silver Bay and Salmon Lake** (**VCUs 3240, 3230)** are technically part of the larger 'Sitka Urban' 2003 Roadless Area. This is one of the most 'remote' areas reachable from the Sitka Road system, and is heavily utilized by Sitkans for recreation, small tour operators, and commercial fishing. The Forest Service cabin at Salmon Lake (and the trail that leads to it) is a favorite hiking trail and camping spot that many of our members utilize for the semi-developed recreation opportunities it provides. It is also a great place to experience wildlife viewing opportunities up close. Grizzly bears, sows and cubs congregate on the shores to eat the salmon that spawn at the nearby Medvejie Hatchery. The watershed is notably biologically productive, and it consisting of one of the few areas around Sitka Sound opened to early chinook harvest in the year of 2018. There is good fishing at both Salmon Lake (cutthroat trout and Dolly Varden populations) and in Silver Bay (pink and coho salmon). Any activities that would compromise the production of salmon and wildlife should be prohibited in this roadless area, including but not limited to: timber harvest, roadbuilding, mining, hydropower/geothermal, transmission line construction, and powerline corridors. These development activities would negatively impact the biological production and ecological integrity of these areas; furthermore, they could negatively impact the economic value of this area as one of the beautiful wild areas that you can drive to on the existing Sitka Road system. The activities that should be allowed in this astounding area of natural beauty include: remote recreation opportunities and the maintenance, upkeep, and development of semi-remote recreation opportunities.

c. **Katlian Bay (VCU 3110, 3120, 3130, 3010)** The Katlian Bay watershed is close to the end of Sitka's municipal road, north of the Starrigavan estuary. There is a small foot trail leading from the 'end of the road sign' that leads to degraded former logging roads built by the Forest Service in the Katlian valley. This watershed experienced heavy logging in the 1960s by the local pulp mill, which used destructive clearcutting and riparian logging that went right up to the streambed, resulting in a heavily compromised ecosystem and watershed[27]. Shee Atika, Inc., Sitka's Urban ANCSA corporation, also heavily logged the 3000 acres they own in the Katlian Bay watershed, also bordering the riparian streamline, further deteriorating this sensitive ecosystem. Sitkans depend heavily on the Katlian Bay for subsistence hunting and fishing due to its proximity to the town. It is also known through traditional ecological knowledge as a site where cohos run later than everywhere else, providing a critical food source to the Tlingit people even in the winter months (cohos were said to run as late as January in the streams here)[28]. Furthermore, it is a sensitive cultural site, as it is the location where the Kiks.ádi tribe first retreated to at the beginning of their survival march after they lost the battle to the Russians for Sitka in 1804. The watershed previously was the site of many fish camps during the summer, and it is likely that there are remnants of this historical past/significant cultural and historical artifacts located on the land.

   i. Due to the ecological, social, and cultural sensitivity and importance of this land, we recommend that it is included as an inventoried roadless area in any new Alaska Roadless Rule. The activities that we recommend are only those consistent with remote and semi-remote recreation, and Special Use Permits (guiding and exploration). Activities that should be prohibited in this inventoried roadless area include: timber harvesting, road building, powerline corridor construction, and mining.

   ii. SCS membership has also expressed significant dissatisfaction with the State of Alaska's attempt to build a road to the head of Katlian bay, with the stated purpose of connecting to the Forest Service logging roads for recreation purposes. We disagree with the Forest Service's granting of the State's request to build through the small area of Inventoried Roadless land near the entrance of Katlian Bay, due to the above ecological, social, and cultural characteristics of the watershed that we

[27] Photos evidencing negatively ecologically-impacting logging practices at the Katlian bay http://vilda.alaska.edu/cdm/singleitem/collection/cdmg41/id/622/rec/1; https://forestservicemuseum.pastperfectonline.com/photo/D9D5A4A0-615A-4EA6-A776-649747374075

[28] Find the reference to TEK on late coho runs in this story of the Kiksadi Survival March of 1804 by Herb Hope, http://www.alaskool.org/projects/history/hope/1804March_12.htm

believe will be negatively impacted during the roadbuilding experience, as well as the astronomical cost of building and maintaining the road itself.

7. **Sitka Sound** (as named in the Large Inventories Roadless Areas of 2003) (VCUs 3000, 3020, 3090, 3100)

    a. **Nawkasina Passage/River/Watershed (3010, 2990, 3000)** is a large river system and very popular for day recreation trips, fishing, hunting, and wildlife viewing amongs Sitkans. Nakwasina River is well known for a late coho salmon run, and also provides one of the best opportunities to catch Dolly Varden. The area is clearly productive biologically/ecologically and contributes to the social, cultural, and economic wellbeing of Sitkans. This area should be included in any new Alaska roadless rule as an inventoried roadless area. It is recommended that the only activities allowed in this watershed are remote recreation, semi-remote recreation, and watershed restoration (including upland thinning if needed). Activities that should be prohibited in this area include: timber harvest, roadbuilding, road reconstruction, mining, powerline corridors, and inter-ties. Nearby Krestof Sound is a T77 watershed and a TNC ecological priority area and it is further noted that damage to this watershed and the associated area from development practices will negatively impact the fish populations that thrive there.

8. **Chichagof Large Named Roadless Area** (2003 RR Inventory) (Stretches the east side of Chichagof Island from Peril Strait to Pelican/Elfin Cove, across Idaho Inlet and ends at border of Neka Mountain named 2003 IRA)

    a. **Including and *especially* referring to Tenakee Inlet,** including: Upper, Middle, and Little Goose Flats (VCU 2260, T77 watershed); Long Bay (VCU 2270,2280, T77 watershed); Seal Bay (VCU 2290, T77 watershed); Saltery Bay (VCU 2310; T77 Watershed); Crab Bay VCU 2320 [T77 watershed]

    b. These areas are heavily depended upon by our members living in Tenakee Springs. Additionally, there are some Sitkans who have secondary homes in the area, and many more who use the area for subsistence harvesting, commercial fishing, or to take their clients on wildlife charters, small cruises, and fishing excursions there. These south side of Tenakee Inlet, which contains all of these extremely high-value ecological priority areas, was spared from clearcutting and roadbuilding during the pulp mill era. These activities, along with any other feature of human development: hydropower/geothermal power, mining, utility line construction, powerline corridor, etc - should be prohibited in these areas. These areas should be managed to maintain their natural character and carbon

sequestration capabilities. The only activities that should be allowed in these aforementioned areas are scientific studies and remote recreation opportunities to hunt, camp, hike, and forage in solitude and peace. Furthermore, the biological productivity of these roadless area would be thus uniquely suited for a baseline study regarding the biological productivity of inventoried roadless areas vs non-inventoried roadless areas. The Forest Service should be conducting a study on the socio-economic impact of subsistence hunting and fishing for Southeast residents and Tenakee Inlet users, and analyze how ecological productivity in the forest is tied to food security in the community.

9. **'Northern Baranof' (as named in the Large Inventoried Roadless Areas of 2003)** Including: Duffield Peninsula, Fish Bay, Rodman Bay, Appleton Cove, Saook Bay, Lake Eva, Little Lake Eva, Kelp Bay, Catherine Island, Baranof Warm Springs, Takatz Bay

    a. All of these places (especially Fish Bay, Rodman Bay, Saook Bay, Lake Eva, and Hanus Bay) have immense historical and cultural value as camps and stops made by the Kiks.ádi along the Tlingit Survival March of 1804[29]. In the current day, they are heavily used for subsistence hunting and fishing by Sitkans, and the area is known for its salmon and deer populations (as well as shrimp and crab, although these populations have suffered from overharvesting and habitat decline). Lake Eva and Hanus Bay are particularly well known for their sockeye runs, which Sitkans depend on for subsistence harvesting during the summer; any development or logging activity would affect the spawning habitat of the salmon populations that Sitkans depend on for food security. The Forest Service has taken on responsibilities to regulate and provide for subsistence opportunities of game on federal land in Southeast under ANICLA Section 814; this responsibility should influence the FS's land use planning and permitted activities (keeping their responsibility to manage subsistence game populations in mind). Furthermore, Hanus Bay/Kelp Bay are historically locations where subsistence harvesters move in after experiencing degradation of their traditional subsistence harvest spots; the Forest Service cannot consider the effects of development on subsistence populations in these places taken in isolation, but also must consider the broader effects that logging in other subsistence use areas will have on increasing pressure and use on areas that are farther away from communities. Northern Baranof comprises some of the most heavily logged landscapes in the Tongass, as stated in the 2007 Conservation Assessment for Southeast Alaska by Audubon Society and The Nature Conservancy, which remarks that a higher percentage of large-tree forest has been logged on

[29] As described by Herb Hope in the 2000 historical account of the Kiksadi survival march: Will the Time Ever Come? A Tlingit Sourcebook, acessed at: http://www.alaskool.org/projects/history/hope/1804March_Index.htm

northern Baranof than anywhere else in the Tongass[30]. These areas now face higher ecological risks due to this previous logging activity, and a several-community fold increase in subsistence activity in these already fragile ecosystems could result in significantly diminished fish and game populations. The areas of Northern Baranof are also heavily recreated, and Sitkans particularly enjoy recreating at the Forest Service cabin at Appleton Cove. They are also used frequently by small tour operators and wildlife viewing cruises.

b. Based on the above observations, SCS recommends that Northern Baranof and all the aforementioned areas within it remain classified as an inventoried roadless area under any new Alaska Roadless Rule. The only activities that should be allowed in these areas are: remote recreation opportunities for hiking, camping, foraging, hunting, and fishing; semi-remote recreation opportunities in the form of public use cabins, establishment of mooring buoys, and hiking trails (while maintaining the natural character of the land); watershed restoration in the form of stream and salmon habitat restoration and wildlife/upland thinning where necessary to speed the return to old growth forest characteristics); and fish-friendly hydropower development. The activities we would like to see prohibited in these areas are: timber harvest, road building and road reconstruction, and mining. We discourage the creation of a cross-island road to Rodman Bay and discourage the Forest Service from any permitting activity they may be obliged to partake in for that regard.

10. **Kake**: The village of Kake has experienced an extreme amount of logging around the village and a resulting lost in critical subsistence resource habitat. The T77 and TNC/Audobon conservation priority areas on Kupreanof and Kuiu islands need to be managed for remote and semi-remote recreation, as well as watershed restoration, stream rehabilitation, and upland thinning where necessary. No large scale timber harvest or continued roadbuilding should occur.

11. **Prince of Wales:** Our member base in Prince of Wales has expressed their views that the Prince of Wales landscape has been extremely exploited both throughout history and ongoing today, and that old growth harvest needs to be phased out as fast as possible. These landscapes cannot take any more. The T77 watersheds on POW, along with the TNC ecological priority areas (as found in Appendix 4), need to be protected under any new Alaska roadless rule, and managed for remote and semi-remote recreation

[30] 2007 TNC/Audobon Society Conservation Assessment Report, Chapter 3: Comparison of Relative Biological Value, Habitat Vulnerability and Cumulative Ecological Risk among Biogeographic Provinces in Southeastern Alaska by David Albert and John Schoen, page 3. https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Documents/3_Chapter_3.pdf

opportunities. No timber harvest or further roadbuilding should be allowed into these areas.

12. It is important to mention that when pointing out specific geographical areas that we would like to see protected, we are advocating for protections on the lands that our membership utilizes most heavily. However, SCS strongly believes that dividing up the Tongass and allowing intensive resource development (including mining, timber harvest, road building, and roads constructed for powerline corridors/intertie maintenance) in other communities will inevitably affect fish and game populations and land use practices in the Northern Baranof / Chichagof region as well. Nothing on the Tongass happens in isolation; fisheries are impacted region-wide by actions taken in specific communities, as well as subsistence harvesting practices and visitor/local use for recreation. If some communities are to experience development activity, it is plausible that the Northern Baranof region could experience an large upswing in usage for commercial fishing/deer hunting/subsistence harvesting as populations are negatively affected elsewhere. We urge the Forest Service to consider refrain from considering the impacts of development activity in one place in isolation, as the effects will reverberate throughout the Tongass.

Inclusion of the Tongass 77 and Audubon/TNC Conservation Priority Areas in Alaska Roadless Rule Inventoried Roadless Areas :

Beginning about 15 years ago, long-term Alaska Department of Fish and Game Biologists John Schoen, Robert Armstrong, and Matt Kirchoff, David Persons, and many other eminent researchers with profound familiarity with the Tongass created the "Conservation Assessment and Resource Synthesis for The Coastal Forests and Mountains Ecoregion of Southeastern Alaska and the Tongass National Forest"[31]. This analysis assessed the landscape of Southeast Alaska and prioritized the areas where it was necessary to limit logging and industrial development to ensure the ecological viability of intact ecosystems and long-term viability for fish and wildlife populations in Southeast Alaska. This body of work combined datasets and research from the Alaska Department of Fish and Game, the USDA Forest Service, an extensive body of academic research, field experience, and data from other federal agencies with population modeling and mapping to prioritize the most important areas on the Tongass.

That work has since been used and integrated into decisions by the State of Alaska and the Forest Service including where to avoid old growth timber sales, where to prioritize restoration activities, and how to ensure habitat connectivity. In the Tongass Advisory Committee process, the convened stakeholders make unanimous recommendations that the Audubon/TNC conservation priority areas be classified as unsuitable for old growth logging. For all of the above reasons, the Sitka Conservation Society requests that all of the identified priority areas in the Audubon/TNC research be classified as inventoried roadless areas and that old

[31] https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx

growth timber harvest should not be allowed in these areas. We request that if there are areas in the Audubon/TNC priority framework that is not currently in inventoried roadless areas, that it be classified as roadless in this process. We request that the Forest Service does allow hydroelectric development in these areas when it does not affect salmon runs and where it does not have an adverse impact on significant habitat areas. We request that the Forest Service allows transmission corridors in these areas only when there are no other options and that they are done in ways that minimizes habitat impacts. We request that the Forest Service does not allow mining in these areas. We request that the Forest Service does allow and prioritize guided hunting, fishing, and sightseeing in these areas as well as cabins, trails and appropriate visitor industry infrastructure investment. We request that the Forest Service prioritize habitat restoration treatments in these areas. For young growth stands in these areas, we request that the Forest Service conducts silvicultural treatments in these areas in ways that accelerate a return to old growth conditions. We would request a thorough analysis of which areas of young growth in these priority areas could create a sustainable yield of timber and which areas are too ecologically sensitive or do not have adequate soils or economics for long term timber rotation.

We do believe that these areas give the Forest Service a win-win scenario for creating multiple uses while conserving a truly globally unique ecological treasure. There is clearly a high demand globally for wild landscapes where people can visit, experience, hunt, photograph, and sport fish. This has proven to be a growth industry in Southeast Alaska and has created hundreds of businesses and thousands of jobs. The Forest Service is just beginning to figure out how they can make the correct strategic investments to enhance and bolster this visitor industry economic sector. The Forest Service is only just now beginning to understand that although the highest volume of tourists are the cruise ship passengers that may be spending money in fur and jewelry stores, the attraction that brings them to the region is the wild landscape, the wildlife, and the fish. Of course the larger spenders are the return visitors and those that stay and book more specialized trips and visits. The other win-win is the salmon production from the Tongass. We are in an era where fisheries are threatened throughout the world and where demand for seafood is increasing. The Tongass produces a prodigious amount of salmon. This salmon return is extremely economically significant resource. The Forest Service is only now beginning to understand the economic significance of this resource and their role in producing this resource. Economic research on the resource has been conducted over the past decade that has resulted in a much fuller appreciation of the value to the American people. The Forest Service has most recently reported the economic value of this resource to Congress in the 2019 Budget Justification, stating:

> “In Alaska, commercial salmon harvest continues banner production, with the recent harvest of 219 million pink salmon providing significant contributions to local economies. Almost half of the pink salmon harvested originate from streams on the Tongass National Forest in Southeast Alaska and production of these prolific wild pink salmon populations benefit from continued watershed and stream restoration efforts. A **recent**

economic study valued Southeast Alaskan salmon at $986 million, including the combined commercial, recreational, and unique subsistence fishery in Alaska."[32]

The third reason that the Forest Service can create a win-win is the subsistence resources that these areas provide for the rural population of Southeast Alaska. The fourth reason is the huge volume of carbon that these areas sequester in the woody biomass, the soils, the tree needles, and the black ball fungal screrotium associated with the undergrowth microryza fungal networks. A map of the Audubon/TNC priority areas as per referenced in current the Tongass Land Management is included in Appendix 4.

The Tongass 77 watersheds[33] are the top salmon-producing watersheds on the Tongass. The majority of these areas overlap with the Audubon/TNC Conservation Priority areas with a few additions based on input from commercial fishermen, ADFG staff, and tribal input. These watersheds were defined using Forest Service VCU data to denote the watersheds that have the highest salmon production values across the Tongass. Use of VCU data is consistent with Forest Service standard operating procedure of classifying management units across the Tongass on VCU boundaries rather than watershed boundaries. The areas that were selected were done using a body of research (including the Audubon/TNC conservation assessment), input from fisheries scientists (including ADFG biologists), and input from commercial, sport, and subsistence fishermen. Commercial fishing gear groups were heavily consulted in the selection of these areas. The work identifying these areas was conducted by Trout Unlimited of Alaska. A map of these areas is included in Appendix 5.

RECOMMENDATIONS FOR ALTERNATIVES

SCS requests that a specific alternative be developed for analysis and public input to the 2001 Roadless Area Conservation Act that specifically follows-up on TAC recommendations and includes the Tongass 77 watersheds and the TNC/Audobon Ecological priority areas as inventoried roadless areas, including those that are not currently in inventoried roadless areas. This alternative should include the following provisions:

- Essential Infrastructure – Section 294.12 of the 2001 Roadless Rule should be amended to allow road construction and reconstruction in inventoried roadless areas in the Tongass outside the Tongass 77 and TNC/Audubon Conservation Priority Areas to access infrastructure that is essential to Southeast Alaska communities—such as communications towers, municipal water treatment facilities, and port and airport facilities.

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[32] https://www.fs.fed.us/sites/default/files/usfs-fy19-budget-justification.pdf, page 24.
[33]Melanie Smith, "Human Uses", Ecological Atlas of Southeast Alaska (2015) http://ak.audubon.org/sites/g/files/amh551/f/t77_subsection_seak_atlas_ch07_human_uses_200dpi.pdf

- Timber – Section 294.13 of the 2001 Roadless Rule should be amended to allow commercial logging and road construction within “roaded roadless” areas in the Tongass that are outside the Tongass 77 and TNC/Audubon Conservation Priority Areas.

- Energy – Section 294.12 of the 2001 Roadless Rule should be amended to allow road construction and reconstruction in inventoried roadless areas in the Tongass outside the Tongass 77 and TNC/Audubon Conservation Priority Areas to access hydropower, wind, tidal, or geothermal facilities that are constructed with the primary purpose of generating renewable power for Southeast Alaska communities.

- Mining – Section 294.12 of the 2001 Roadless Rule should be amended to explicitly allow reasonable access for mining activities pursuant to existing law and regulation.

- Transportation – Section 294.12 of the 2001 Roadless Rule should be amended to explicitly allow road construction and reconstruction in “Section 4407” transportation corridors, as established by Public Law 109-59.

- Conservation – Inventoried Roadless Areas of the Tongass should be updated to include the areas identified in the 2003 Supplemental Environmental Impact Statement and all lands within the Tongass 77 and TNC/Audubon Conservation Priority Areas, including those areas outside existing inventoried roadless areas. These areas are especially important for their unique ecologic value and the economic value that derives from maintaining these areas as in-tact and wild places. These lands should be managed to protect their roadless values for current and future generations

Conclusion

In conclusion, we encourage the U.S. Forest Service to listen to the voices of Southeast Alaskans in this process, and give equal weight to the thousands of citizens who are voicing desire for increased protections and a more sustainable method of development in Southeast Alaska. We are tired of the boom and bust, heavy resource extraction days of past and do not want to see a return to clearcutting on Northern Baranof. More than that, we would like the Forest Service to honor the public process and unprecedented collaborative engagement that led to the creation of the 2016 TLMP and the Tongass Advisory Committee process. Compromises were made, relationships were forged, Southeast Alaskans from all walks of life decided to get down to the business of creating a transition to a more sustainable future for the Tongass. We hope to see collaboration on the State’s Citizen Advisory Committee, but must advocate as well for our members and overwhelming support for maintaining the 2001 rule or creating one with more restrictions for activity, especially on the most ecologically productive areas of our landscape - which are all too often the ones that we depend on most for our subsistence harvesting, our livelihoods, our businesses, our culture, our way of life.

The forest service should listen to the outpouring of support from thousands of Alaskans and Americans and create a rule that works towards the long-term resiliency of a Southeast economy. Instead of creating costly, taxpayer-subsidized roads for large old growth timber sales that are both unsustainable and detrimental to our collective prosperity, the Forest Service should use this opportunity to create a flexible rule that focuses on providing communities with the access to infrastructure they need, while conserving the most ecologically productive areas for our food security and economic livelihoods (including the Tongass 77 and TNC/Audubon Conservation Priority Areas), and implementing the transition to stimulate young growth timber management on the Tongass.

Sincerely,

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Appendices

Appendix 1) Sitka Conservation Society Board of Directors and Affiliations
Appendix 2) Sitka Conservation Society West Chichagof Wilderness Proposal and Map
Appendix 3) Sitka Community Use Area: 1997 Ballot Initiative, Map of Sitka Community Use Area, 2013 Watershed Priority Survey
Appendix 4) Audubon-TNC Conservation Priority Areas (Map)
Appendix 5) Tongass 77 Top Salmon Producing Watersheds
Appendix 6) Taxpayers for Common Sense: Timber Sales and Associated Losses to Taxpayers on the Tongass National Forest
Appendix 7) What Southeast Communities Want: Media and Recorded Audio during Forest Service Scoping Meetings in Southeast Communities