17 December 2019

US Forest Service

Attention: Alaska Roadless Rule

PO Box 21628

Juneau, AK 99802

Thank you for the opportunity to comment on the proposed action regarding the “roadless rule for Alaska.

The Tongass National Forest is part of the largest temperate rainforest in the world and contains the only remaining intact watersheds in the northern hemisphere (and arguably in the world). These are watersheds that have no or minimal human effects which include timber harvest, dams, agriculture, permanent human structures, or roads from their headwaters to their entrance into the ocean. The unique characteristics of the physical and biological diversity of the Tongass National Forest have been described by an overwhelming number of written publications both popular and scientific as well as in visual outlets. The diverse and complex set of physical and climatic features contribute to abundant fish (primarily economically important salmon) and wildlife. All are dependent upon old-growth forests. Once these watersheds are opened to road construction and other development they will be lost forever. In this context they should placed as world heritage sites.

The processes in these watersheds that have evolved over millennia support healthy and sustainable populations of economically important species (e.g. salmon) and economically important but difficult to measure ecological functions. One aspect is connectivity of habitats, free flowing rivers and their tributaries from the alpine through the floodplain to the intertidal zone. Connectivity includes natural hydrological events (i.e. seasonal floods), important to salmonid life cycles, and open migration routes for large and small wildlife species. Introduction of roads and development will interrupt these processes even under the best of practices.

Large areas of the Tongass National Forest, and forest lands managed by private (primarily Native Corporations), and state-owned lands are open to moderate or intensive management and development. Nothing is free and many resources will be affected as these watersheds are exploited. Adverse effects, large and small, of development have been measured and documented especially for economically important species such as salmon, deer and other larger wildlife species. Other effects often less obvious, especially in the short term (less than 10 years, for example), are important to ecosystem function and are difficult, expensive, and complicated to measure. The intact watersheds provide both a buffer and a reservoir for fish and wildlife against the various adverse effects of past and future management activities.

Removing the exemption of the “roadless rule” for Southeast Alaska will effectly remove the buffer that the intact watersheds of the Tongass National Forrest provides to salmon, wildlife, and the unique ecosystem that is Southeast Alaska. Once the intact watersheds are developed, they be gone forever and cannot be recovered ever. Removal of the roadless rule for the Tongass National Forest is a short-sighted and ill-conceived policy for a short-term gain that will benefit only few people to the detriment of many.

The best alternative for the forest and the important ecological services that it provides is the alternative of “No action”. Alternative 6 is the most damaging and will have lasting consequences for generations into the future.

Sincerely,

Mason D. Bryant

Douglas, Alaska