

December 16, 2019

To: Earl Stewart, USDA Forest Service, Alaska Region, Ecosystem Planning & Budget Staff & TNF Supervisor,
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Thank you for the previous and current opportunity to submit comments on potential modification of the existing Roadless rule's inclusion of the Tongass NF and Alaska. I appreciate the availability of documents online to review the project start to finish. I am again submitting these on my own behalf, based on my long-term experience as a Fishery biologist, 32 yrs residency in Alaska, and most recently my involvement in the commercial salmon troll fishery in SE Alaska. I previously commented during Scoping for this topic in October 2018.

Since arriving in Alaska in 1986, I was always involved with fish- starting with evaluating fish habitat in Bristol Bay with US Fish and Wildlife Service, through academic and research studies toward my Masters Science at University of Alaska, working as a fisheries biologist conducting habitat studies on Seward Peninsula near Nome with US Bureau of Land Management, then with ADFG as a researcher for 12 years in Interior Ak, then 11+ years as an area fisheries biologist in the Petersburg/Wrangell/Kake area. While there I was involved with fishery management, coho and Chinook salmon research and monitoring, and the permitting/reviewing/commenting for SOA for a variety of resource development issues involving the Tongass NF timber sales, State Forestry, local and transboundary Stikine mining, and hydroelectric power development projects. Since then I have moved-on into commercial salmon fishing.

To be clear, after reviewing project materials on the various alternatives, I remain in support of Alternative One, the no-action alternative to continue Alaska's inclusion in and under the Roadless Rule. The Roadless Area Conservation Rule (2001 Roadless Rule) was adopted into regulations at Title 36 of the CFR in January 2001. This nationwide effort was extensive and eventuated in the inclusion of 44.7 million acres, representing about 24% of the total National Forest System lands. This includes about 9.2 million acres of the Tongass, reflecting about 55% of the Tongass. The Roadless Rule has provided a firmer backstop to what might otherwise be unchecked resource development in SE Alaska. The rule was, and is supported by many Alaskans, as gauged by the overwhelming response at scoping. The areas maintained within IRA's have been integral to life in SE Alaska communities by many individuals for fishing, hunting, gathering and recreating in many cherished areas. Too, they often provide the scenic magic which helps drive and grow demand for "wild places" by tourists, and, maintain high fishery value and desirability for sport- and commercial fisheries in these areas, and provided greater contiguous areas of unfragmented wildlife habitat.

However, areas outside of IRA's, which were highly valued for timbering, have been harvested through FS administered timber programs that have evolved to more and more deficit logging as timber sale development and road construction costs have gotten higher relative to the market and market value for timber. Concurrent to this has been the general decline in large-scale SE Alaska timbering with only one significant mill in Klawock, on Prince of Wales Island, with small timbering operations continuing to provide for more niche markets. A current trend as seen in recent times has been movement toward helicopter logging and barging logs overseas, more profitable without the workforce needed for traditional logging and milling, and correspondingly less money remaining in the communities.

Concurrent to the decline in timbering has been the increase in need for restoration and rehabilitation in response to poorer stewardship responsibility by the managing agency than should ever have been allowed. Poor quality timber road construction, cutting corners when dealing with road design and stream culvert engineering has left the Tongass with over 1,000 problem stream culverts, that, together with greater sedimentation input risks associated with this temperate rainforest's high rainfall and percentage of roaded area (relative to watershed area), can reduce the total quantity and quality of fish spawning and rearing in-stream habitat. Given the critical linkage between fish habitat (access and quality), fish production and sustainable salmon fisheries in Alaska, the significant fisheries economy here in SE Alaska is being weakened and will continue to be weakened by FS Agency inactivity to deal with these culverts and impacted stream habitats. *(It is most probable that had the FS carried out concurrent repairs to fish passage problems associated with roads used to access specific timber sales, the return-on-investment (ROI) would be further depressed, making large-scale logging in SE Alaska economics look worse and worse, and harder to subsidize the losses, and continue the program.)*

In recent years we have firsthand witnessed downturns in the SE Alaska salmon fishery productivity and a resulting decline in fishery value to participating fishermen, such as myself. When year classes of fish such as pink or coho salmon are impacted, whether by poorer oceanic survival, or from over-fishing/under escaping returning adult salmon, having un-hindered access to quality spawning and rearing stream habitat, through properly scaled and operating road culverts, helps to ensure the best outcome from the adult salmon that return and spawn. My point is to denote and speak up for the important and needed partnership between fisheries management and managing and maintaining fish habitat. Clearly, ADF&G is responsible for managing sustainable fisheries, and there is no question that the program of active, in-season management clearly works to escape adult returning salmon to their natal streams. However, continued failings by the U.S. Forest Service in Alaska to comprehensively address Tongass-wide fish passage and habitat function, and become more of an active, co-managing party with ADFG, clearly shows there is room for significant improvement. That will not happen in our lifetimes by expanded timbering access to remaining old growth, but only if, and when funded repair/replacement of "Red" and "Yellow" culverts occurs to maximize fish passage and juvenile fish production.

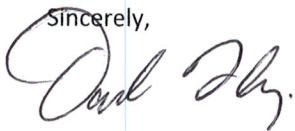
However, the Regulatory Impact Assessment and the Cost-Benefit Analysis on p43 asserts the following unsupported claim, *"The proposed rule and other regulatory alternatives are not expected to have a significant change to the commercial fishing or fish-processing industries over the planning period provided the 2016 Forest Plan protections remain in place."* Such a claim cannot, or should not be made in public, as the complexity of forecasting outcomes or behaviors with so many involved factors is beyond reason, particularly to be undertaken while in a dynamic period lately experiencing greater extremes and volatility in climactic conditions. Impacts to commercial fishing (catches) can ultimately be influenced from fresh and marine habitat impacts such as thru unforeseen shifts in rainfall, runoff, erosion, sedimentation, variable fish passage/blockage to critical habitat, increases in roading percentage within watershed area (erosional susceptibility), as well as stream heating/cooling/freeze-down/sedimentation impacts upon success or survival through incubation, hatching, rearing, and smolting. Later, survival to oceanic feeding areas and variations in oceanic food web productivity and distribution, such as the so-called "blob" fine tune the survival to pre-spawn adult life stages when fisheries harvests are then influenced. Furthermore, portions of these returning salmon abundance are harvested, and influence patterns or trends of fishing harvest, which influence business decisions that may alter or sustain fish processing plant operation or employment levels. In conclusion, there is no substantiation to conduct and conclude such a lack of impact, or negligible effect with available information.

There is no way to "cut their way out of this mess-up" by integral stewardship programs with enhanced access to more old-growth timber removal that alternatives number 2-6 would provide. If the roadless rule is lifted by

decision, the US Forest Service will charge ahead and spend their monies on preparing future old-growth timber sales that will benefit few, and not carry-out the huge backlog of repairs and replacements of problematic fish culverts. At this time, no alterations to Alaska's coverage by the existing Roadless Rule should be allowed until the time when the US Forest Service finds and provides the extensive financial support, and executes the repair of the back log of problem road culverts (i.e. "Red" or "Yellow" pipes). There are many other reasons to avoid exempting Alaska that include the ridiculous economics of propping up of a handful of timbering jobs that can be found elsewhere, along with arguments for carbon credits, carbon sequestration, fragmentation of wildlife habitat, and wild lands preservation for future generations. There is much more information and evidence from research and professional experience that can either clearly show or continue to promote public outcry against this poorly thought out action. In essence, please listen...

Again, I appreciate the opportunity to provide comments, and after reviewing the various materials, my position remains opposed to changes to the Roadless Rule with regards to Alaska-

Sincerely,

A handwritten signature in cursive script, appearing to read "Doug Fleming".

Douglas Fleming