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First name: victoria

Last name: mcdonald

Organization: Tongass Conservation Society

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Ketchikan, AK 99901

To Forest Service Officials involved in the Alaska Roadless Rule

Having been reliant on the ecological integrity of the Tongass National Forest since 1974,

I want the Tongass to be included in the Roadless rule. Unfortunately, the Roadless Rule, which should be based on scientific findings, has been changed many times, depending on the political stripe of the federal administration. Adding insult to injury, our congressional delegation advocate clearcutting the Tongass, despite overwhelming evidence of the importance of the Tongass.

The current administration is making every possible effort to log or mine this iconic forest for the exaggerated promise of jobs. The "timber industry" accounts for 1% of Southeast's economy and yet some continue to advocate for this ghost industry. Viking timber, the only remaining mill in Southeast, pleads for more timber, yet when logs are delivered, most of it is shipped overseas, not benefiting the local economy .

In contrast tourism, which expands yearly, contributes a much larger share of our economy. Many visitors plan to see our forest, many come to fish, and some hope to see a glacier.

If forests are decimated, fish runs decrease because their spawning areas are polluted or too warm for smolts and glaciers are melting rapidly, they will realize how drastic climate change in our State. Tourism promotes healthy forest and clean water.

As the climate warms, scientists have found that old-growth is a massive carbon sequesterer, and yet the Forest Service continues to cut old-growth areas. Americans are aware of the need to re-absorb CO2. Leaving the Tongass out of the Roadless means that massive carbon holders will disappear. Yes, young trees will grow and absorb some carbon but owing to the cold, acidic soil of the Tongass, it will take at least 200, if not 300 or 400 to be able to absorb as much as the trees that will be logged without Roadless protection. Our nation is falling behind the race to stop global warming; keeping our large tree stands will slow this warming.

The Tongass is the only forest in Alaska that is threatened by continued logging. The Chugach, although valuable, does not offer the same amount of old-growth, and there is no mill in the area. Alcan Timber of Ketchikan demands available trees, but again, they ship logs overseas. With the current tariffs on American profits, where will Alcan ship its logs? Haven't we reached the end of an era in the Tongass where trees are more valuable standing than clear cuts?

Contrary to misconceptions, the Roadless does allow roads and electrical lines to be built and maintained and mines developed with strict regulations. The Tongass has thousands of miles of roaded areas that enable hunters and recreationists to access the forest. The Roadless Rule does not block human use, but seeks to protect the habitat which residents rely on.

Every single timber sale on the Tongass has been subsidized, at great expense to American taxpayers. However, this fact is carefully shrouded when timber sales project the number of jobs that will be produced. Statistics of economic growth have not told the true story of how much logging truly costs. The US government has paid to destroy our forests, a strange idea for anyone who pays taxes.

Logging on the Tongass began in earnest in the late 50's and 60's, ramping up in the 70's and 80's. Timber sales focused on riparian areas where the largest trees stood; those areas also provided prime habitat for mammals, fish, and birds of the Tongass. Timber sales increased quickly, and Ward Cove was often jammed with log rafts, with more waiting to be towed to the mill. Ketchikan Pulp mill had no reliable regulatory agency overseeing its operations, so when it closed in 1997, a Superfund site remained. Today, 22 years later, there are no clams of other bottom dweller surviving in Ward Cove. A commercial herring fishery in Ward Cove was eliminated since herring demand clean water, something the Department of Environmental Conservation did not think important. Salmon do swim through that polluted waterway to access Ward Lake and its tributaries, but they have developed the ability to access clean water beyond Ward Cove.

Native corporations were granted timber rights on Dall Island, that once held enormous trees. Prince of Wales held huge stands of old-growth and were cut as quickly as possible. Some of the timber units held high volume stands. The Forest Service allowed "experimental areas" where allowable logging acreages were doubled. "Experimental areas" were excuses to break the law on the size of clearcuts. Revillagigedo Island has been heavily logged, and remains an island that continues to be logged. Now the pressure has moved north to the areas surrounding Wrangell and Petersburg. Residents in those areas are also reliant on a healthy forest, something that is ignored in choosing the most invasive alternative in the FEIS'.

Native corporations cut areas surrounding their villages. Kake Tribal was told they could log for 50 years as ships from Asia filled Keku Straits. They arrived with decks high above the water, but as the logs filled their holds, they sank deeper into the ocean, then sailed away with their booty. I lived in Kake for 10 years, teaching school for 9 months, and commercial fishing during the summer. Native fishermen who held limited entry permits sold their

permits for the larger amounts of money earned from logging. Logging ended in Kake after 15 years, but the subsistence economy was forever altered. Kake struggles to maintain itself, after the big money years. Other corporations have also suffered from a false sense of security surrounding logging.

Another false idea was to cut the once-termed "overly mature" trees to make way for young trees. When new trees sprouted, they had access to sunlight and grew quickly, choking the land so that deer or bear could not enter. Instead of old-growth stands where trees fought for sunlight, second growth trees grow thick growth rings. Second growth wood does not have the strength of old growth, warping easily when cut and milled. In addition, second growth does not produce viable timber for at least 75 years and longer.

Deer numbers have decreased in logged areas, not because of wolves, but because winter habitat on south facing slopes was eliminated with logging. Deer depend on south facing slopes, that produce big trees, highlighted for timber sales. Hunting deer is an importance subsistence activity in Southeast. Subsistence hunters were allowed only 2 deer this year. Sitka Black Tail deer are small; two animals per hunter are minimal, considering they are hunted in the largest national forest in the U.S.

Soils in the Tongass are shallow and infertile, building slowly since the last Ice Age, often having only 6 to 8 inches on top of bedrock. Since there is little soil in the Tongass, karst, or limestone provides better growing condition and were targeted for logging. Prince of Wales holds world class limestone caves but after logging, many of the karst areas lost topsoil, leaving them bleached and sterile. Formerly rich areas for tree growth are denuded and bare. When flying over Prince of Wales, the many clear cuts are overwhelming, showing how the Forest Service altered a world class rainforest into a shorn landscape.

According to the team leader for the Central Prince of Wales timber sale in the 1990's, the Forest Service had not been able in past sales to fulfill its contractual obligations for board feet of timber because the terrain is mountainous, rocky or otherwise not able to be logged. Therefore, timber sales spread beyond boundaries; when a new timber sale was planned, the surrounding land had already been cut. Statistics on what had been cut and what was available were never acknowledged. Central Prince of Wales was not approved because the board feet prediction was not available.

Wolf numbers have been decimated, especially in areas that have been roaded. Trapping is allowed and many poachers brag about killing wolves. However, the predator/prey balance must be maintained, if the deer population is to be kept healthy. Wolves need large areas to be able to feed pups, and there are insufficient connecting areas for wolves to breed and live successfully. Wolves are part of a healthy ecosystem, dependent on having sufficient wilderness for hunting.

In summary, The Tongass must be part of the Roadless Rule, in force for the rest of the United States. The best areas have been cut and citizens, once exposed to this National Forest, regard it as the Crown Jewel of our forest system.

Thank you for your time,

Victoria McDonald for

Tongass Conservation Society

Ketchikan, AK 99901

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