Data Submitted (UTC 11): 12/4/2019 9:00:00 AM
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Title:
Comments: See attached comments.

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December 4, 2019

Secretary Sonny Perdue Chief Vicki Christiansen

U.S. Department of Agriculture United States Forest Service

Jamie L. Whitten Building Sidney R. Yates Federal Building

1400 Jefferson Dr SW 201 14th street SW

Washington, DC 20250 Washington, DC 20227

Via regulations.gov: Department of Agriculture- Forest Service- Docket ID No. 2019-22638

RE: Ecological Society of America Comments - Department of Agriculture Forest Service; Proposed Rule - Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska; (36 CFR Part 294, RIN 0596-AD37, Docket ID No. 2019-22638

Dear Secretary Perdue and Chief Christiansen:

On behalf of the Ecological Society of America , the world's largest professional society of ecologists, I write to strongly oppose the U.S. Forest Service's (USFS) proposal to open 9.2 million roadless acres of the Tongass National Forest (hereafter Tongass Forest) to development and supports the full enforcement of the Roadless Area Conservation Rule (hereafter 2001 Roadless Rule) (66 FR 3244) for the Tongass Forest.

The Ecological Society of America recommends "Alternative 1- No Action" in the USDA Forest Service Draft Environmental Impact Statement (no change to the current development plan) and strongly objects to the proposal to open large areas of the Tongass Forest to development.

The Forest Service proposal would open to development more than half of the Tongass Forest [mdash]leaving only a third of the forest as undeveloped wilderness. The Forest Service presents 6 Alternatives ranging from no change in the current status of the Tongass Forest (Alternative 1) to Alternative 6, which would open the largest amount of land to development. The Forest Service names Alternative 6 as its preferred alternative to implement. Alternative 6 would exempt the Tongass Forest from the 2001 Roadless Rule and open 165,000 acres of old-growth forest to logging.

ESA strongly opposes the Alternative 6 Plan for both ecological and societal reasons:

1. The Tongass Forest is part of the largest intact temperate rainforest in the world, stretching from Alaska to northern California in a narrow band along the North Pacific coast. Old-growth forests within this unique ecosystem type are globally endangered by logging and other development, as well as by climate change.
2. Old-growth temperate rainforests store large amounts amount of carbon, much of which would be lost to the atmosphere and augment the rate of climate warming, if these lands were logged. The Tongass Forest accounts for 8% of all carbon stored in the U.S. National Forests1.
3. Coastal watersheds within the Tongass Forest export large amounts of fresh water and nutrients such as carbon, nitrogen, iron, and phosphorus to the North Pacific Ocean, fueling productive marine food webs and globally-important fisheries. Increased disturbance to these watersheds will impact this nutrient exchange from the land to the sea.
4. The Tongass Forest provides freshwater spawning and rearing habitats that support large wild salmon populations. Increased road building, culvert installation, and logging will negatively affect these habitats, changing hydrology, water temperature, nutrient export, aquatic food webs, and silt loads. Wild salmon populations will decline with increased development in the Tongass Forest, affecting fisheries and fishery-dependent industries.
5. Tourism in Southeast Alaska is on the rise, with up to 1.4 million visitors expected in 2020.2 Tourists, many of whom arrive on cruise ships, come to Alaska to experience pristine wilderness, see wildlife, and enjoy fresh seafood. Further development in the Tongass Forest that negatively impacts these values will have deleterious effects on this growing industry.
6. Opening the large old-growth areas of the Tongass Forest for logging would add very little to the economy in southeast Alaska. The timber industry in southeast Alaska only supports about 300 jobs and contributes less than 1% to the local economy3. Logs, dimensional lumber, and pulp produced in southeast Alaska are not economically competitive in domestic markets and are currently subject to tariffs and global supply issues in international markets. The economic benefits of extensive logging in the Tongass Forest are much smaller than the economic benefits to fisheries and tourism of keeping the Tongass Forest intact.
7. Almost one million acres of the largest and most accessible timber on the Tongass Forest has been cut in the last 65 years, and the timber that remains is very expensive to

1 Leighty, Wayne & Hamburg, Steven & Caouette, John. (2006). Effects of Management on Carbon Sequestration in Forest Biomass in Southeast Alaska. Ecosystems. 9. 1051-1065. 10.1007/s10021-005-0028-3. https://www.researchgate.net/publication/225169208_Effects_of_Management_on_Carbon_Sequestration_in_Forest _Biomass_in_Southeast_Alaska

2 http://www.raincoastdata.com/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf

3 http://www.raincoastdata.com/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf

access. Over the past 20 years, it has cost the Forest Service nearly $600 million (in year 2018 dollars). More than 40 percent of this cost was related to Forest Service spending on roads. Taxpayers would thus pay most of the costs for new logging roads constructed if the Tongass Forest were exempted from the Roadless Rule. In addition, other types of development projects (e.g., mining and hydropower) can be approved as individual projects without the proposed exemption of the Tongass National Forest to the 2001 Roadless Rule.4

1. The Tongass is culturally essential to the Tlingit and Haida people, who have lived in southeast Alaska for thousands of years. The U.S. Federal Government has a formal government-to-government trust responsibility to these people to consult them in their proposal to open the Tongass National Forest to development. They have

not done so (see letter opposing logging of old growth areas from the Native village of Kake because of lack of consultation).5,6
2. The USDA Forest Service proposal provides no information on the location of lands to be opened, making it impossible to evaluate the specific impacts of the proposed changes. This does not allow the application of "best available science" in evaluating the Forest Service proposal, as required by law. In addition, the short time available for public comment (through December 16, 2019) allows insufficient time for thoughtful rational discussion of the 6 Alternatives that the Forest Service has presented.
3. The majority of citizens of southeast Alaska oppose logging of old-growth from the Tongass National Forest 7 (see letter from the Southeast Alaska Conservation Council). The proposal by the Forest Service to open the Tongass to increased development thus threatens the credibility of the USDA Forest Service with the people who are most directly affected by this proposed change (see resolution approved by the City of Gustavus city council).8

In light of all these points, the Ecological Society of America recommends "Alternative 1- No Action" in the Draft Environmental Impact Statement (no change to the current development plan) and strongly objects to the Alternative 6 proposed plan to open large areas of the Tongass National Forest to development.

Thank you considering these comments.
Sincerely,

The Ecological Society of America

4https://www.taxpayer.net/wp-content/uploads/2019/09/TCS-Cutting-Our-Losses-2019-.pdf

5https://www.indianz.com/News/2019/10/21/respect-alaska-tribes-rights-on-the-tong.asp

6https://cara.ecosystem-management.org/Public/DownloadCommentFile?dmdId=FSPLT3_4479222

7https://www.juneauempire.com/news/support-for-roadless-rule-extends-through-state-country/

8. https://cms.gustavus-ak.gov/sites/default/files/fileattachments/ordinance/16501/cy18-31.pdf

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