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First name: LaVern

Last name: Beier

Organization:

Title:

Comments: The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

## Trump & Governor Dunleavy's Tongass Roadless Rule Reversal Plan Threatens Alaska's Brown Bear Populations

Alaska's Tongass National Forest is the largest of the 154 National Forests in the U.S. The Tongass and the Amazon tropics contain the largest and last intact old growth rainforests left standing in the world.

I was a brown bear expert in the Tongass with Alaska Department of Fish & Game for 35 years from 1981 retiring in 2016. I've slogged up dozens of bear infested salmon streams in study areas on Admiralty and Chichagof Islands and along southeast Alaska's mainland stretching from Misty Fjords National Monument to the south up the coast north to Yakutat Forelands and Malaspina Glacier in the Wrangell-St. Elias National Park Preserve. I've captured, immobilized, radio-tagged and radio-tracked over 1000 bears collecting scientific data and conducted DNA/population estimates. I fitted the first brown bear in the Tongass with a VHF radio-transmitter on Greens Creek on Admiralty Island in 1981. In 2001, I fitted the first brown bear or any big game animal in the Tongass with a GPS/VHF radio-transmitter on Game Creek on North East Chichagof Island. With this unique knowledge and looming threat, I've evolved into a necessary ambassador for brown bears and the wilderness they inhabit in the Tongass National Forest.

Primarily known as a brown bear expert, beginning in 1973 I have also participated in a variety of wildlife research/management projects throughout the Tongass National Forest including expertise in the safe capture, immobilizing, radio-tagging/tracking and ecology of; Sitka black-tailed deer, mountain goats, wolf, wolverine, elk and black bears.

Brown bears are the second slowest reproducing of the 28 big game species in North America. In the early 1800s during Lewis & Clark's Expedition grizzly bears occurred in nearly every state west of the Mississippi River but as a result of human encroachment by 1956 only three states, Montana, Wyoming and Idaho contained marginally sustainable grizzly populations. Historical, ecological and biological evidence across North America are clear that road access combined with human development/activities within brown bear home ranges will with certainty lead to fewer brown bears and potentially threaten brown bear populations. More importantly, a brown bear population could easily suffer dramatically if the female component of a population is systematically removed.

Today six of eight bear species in the world are endangered. To assure cub survival, female bears accompanied with cubs of all 8 bear species in the world require a safe escape location from being killed by male bears/predators. The Tongass old-growth trees adjacent salmon streams are key components for cub survival.

The Forest Service manages the forest on a 100-year harvest rotation equating to tree diameters <20". Clear-cuts have no value to wildlife once the canopy closes in at 12-14 years. Tongass forests do not emulate old-growth characteristics until reaching 120-years-old, once logged they will never reach old-growth characteristics again. Most brown bear den sites in the Tongass are located in the base of large live or dead standing trees >36" diameter or in natural rock cavities. Stream buffers along anadromous streams are 500 feet, less on private land.

Brown bear studies in the Tongass are well documented in valleys adjacent to salmon streams encompassing

logging roads, clear-cuts and second growth. Here, male brown bears are forced to adjust to the habitat alterations and stay close to salmon streams and dominate the stream. Simultaneously, female brown bears with and without cubs are now also forced to adjust their salmon fishing strategies in the altered landscape within their home range. They now must navigate through clear-cuts and second growth in search of safe escape trees for their cubs far away from male dominated salmon streams. Consequently, these female brown bears and cubs spend little time on male dominated salmon streams fishing and consuming high protein fat salmon necessary for denning and cub survival. These female brown bears spend more time burning energy navigating through clear-cuts and second growth seeking refuge in standing trees and avoiding males verse fishing. The end result of an altered landscape within a female brown bear's home range increases cub mortality by males compounded by the fact these female brown bears do not consume adequate salmon for denning and cub survival. In addition, lack of high reliable salmon fat for pregnant female brown bears means smaller litter sizes. Cumulatively, gradually fewer surviving cubs and fewer bears.

To compound threats to brown bear populations in the Tongass, by gradually converting old-growth brown bear habitat into clear-cuts and second growth, this is exacerbated by from a brown bears' perspective, it's a fact roads evolve into bear trails as a travel route of least resistance. This simultaneously increases bear encounters with man's activities resulting in exponentially and cumulatively increasing mortality of all demographics of the population.

There are nine distinct DNA brown bear populations in the Tongass, each unique in the world. Reversal of the existing Roadless Rule would have cumulative adverse effects on six of these nine brown bear populations. Perhaps more paramount, climate change is not addressed in reversal of the Roadless Rule despite the fact it has potential to affect future brown bear populations more adversely than any other human activity.

Of the 154 National Forests the Tongass rises above all other National Forests eclipsing most of the nation's National Parks with a long history containing for residents, nationally and internationally acclaimed and irreplaceable natural treasures.

It is well documented, visitors from around the world travel to Alaska with hopes of seeing three animals, bald eagles, whales and brown bears. Wilderness is the symbol of brown bear habitat, and God isn't making wilderness anymore. Once it's gone it's gone forever!

As an advocate for saving the last and largest intact old-growth forest stands in the world along with the wilderness habitats that sustain brown bear populations for future generations on the globe there is only one alternative that at this point in our planet's history that is acceptable, I choose Alternative #1, NO ACTION.

Thank you for the opportunity to comment.

LaVern Beier

Box 21116

Juneau, Alaska 99802

[See attachment containing an image of a man holding a national geographic magazine]

[See attachment of images of trees, forests, and mountains with the caption "Vanishing Brown Bear Habitat In The Tongass"]

[See attachment of images of bears with the caption "Roads/Human Activities Increases Brown Bear Mortality For All Demographics Of The Population. Roads/Logging Threatens Old Growth Brown Bear Den Trees >36"

Diameter]

[Position]

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