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Comments: December 16, 2019

Alaska Roadless Rule

USDA Forest Service, Alaska Region

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Submitted electronically at: [www.fs.usda.gov/project/?project=54511](http://www.fs.usda.gov/project/?project=54511)

Attn: Roadless Area Conservation; National Forest System Lands in Alaska

Dear Secretary Perdue,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast.

The Tongass National Forest is America's largest national forest and the largest remaining intact temperate rainforest in the world. It is no coincidence that the Tongass National Forest is home to the rearing habitat for some of the last remaining healthy salmon runs in the world. The Tongass supports a thriving and sustainable commercial fishing industry, bringing in billions of dollars of revenue each year. The Tongass hosts all five species of wild Alaska salmon in pristine water and river systems dependent upon an intact Tongass National Forest, specifically the 9 million acres of intact habitat and old growth forest preserved by the 2001 Roadless Rule. Accordingly, we are writing to urge you to select the "no action" Alternative 1 for USFS Docket ID: FS-2019-0023 Alaska Roadless Rule #54511.

Aside from hosting rivers full of valuable salmon, the Tongass National Forest stores a vast amount of carbon - more than any other national forest. According to scientific studies, old growth is much more productive for carbon storage than young growth. As a temperate rainforest, the Tongass National Forest's spruce, cedar and hemlock trees grow slowly. As a rainforest, however, the Tongass' trees are resistant to the climate change-driven wildfires ravaging much of America's national forests. This makes it doubly important to preserve the old growth the Tongass has left: not only is it more resistant to climate change and to wildfires, but if cut, the forest will take hundreds of years to return to the same level of productivity, if it ever does.

And yet, the DEIS makes the assertion that "Overall effects to fish habitat are expected to be negligible under all alternatives[hellip]" Given the hundreds of ineffective culverts resulting in many miles of lost spawning habitat already in the Tongass as a result of previous road building activity, we find it more likely that the effects would be much more than negligible. Even if large scale logging does not happen as a result of road building, the very act of building roads will likely have a long lasting negative impact on salmon production and with it our livelihoods as commercial fishermen.

Salmon and the forest are interconnected. Salmon need intact watersheds; in return, they bring marine-derived nutrients literally into the trees. That is why some of these watersheds have been identified as so important, and why clear-cutting them threatens salmon and therefore commercial, sport and subsistence fisheries.

Fishing plays an important role in the economy throughout Southeast. We must continue to make decisions that safeguard the "natural infrastructure" for fishing Southeast, and focus Forest Service resources on supporting these sectors to create new jobs and opportunities in Southeast Alaska.

Thank you for your time. Please select Alternative 1, "No Action," for the Tongass National Forest.

Sincerely,

Matt Alward Frances H. Leach

President Executive Director

## MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers \* Alaska Longline Fishermen's Association \* Alaska Scallop Association

Alaska Trollers Association \* Alaska Whitefish Trawlers Association \* Armstrong Keta \* At-sea Processors Association \* Bristol Bay Fishermen's Association

Bristol Bay Reserve \* Cape Barnabas, Inc. \* Concerned Area "M" Fishermen \* Cook Inlet Aquaculture Association \* Cordova District Fishermen United

Douglas Island Pink and Chum \* Fishing Vessel Owners Association \* Freezer Longline Coalition \* Golden King Crab Coalition \* Groundfish Forum \* Kenai Peninsula Fishermen's Association \* Kodiak Crab Alliance Cooperative \* Kodiak Regional Aquaculture Association \* Kodiak Seiners Association \* North Pacific Fisheries Association \* Northern Southeast Regional Aquaculture Association \* Petersburg Vessel Owners Association \* Prince William Sound Aquaculture Corporation \* Purse Seine Vessel Owner Association \* Seafood Producers Cooperative \* Southeast Alaska Herring Conservation Alliance

Southeast Alaska Fisherman's Alliance \* Southeast Alaska Regional Dive Fisheries Association \* Southeast Alaska Seiners

Southern Southeast Regional Aquaculture Association \* United Cook Inlet Drift Association \* United Southeast Alaska Gillnetters

Valdez Fisheries Development Association

Development Association

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