

Data Submitted (UTC 11): 12/14/2019 9:00:00 AM
First name: Robin
Last name: Todd
Organization: Maryland Ornithological Society (MOS)
Title:
Comments: Tsongass Roadless Rule - MOS comments

Dear Sir or Madame,

Please find attached comments by the Maryland Ornithological Society (MOS) on the proposed Tsongass Roadless Rule. We appreciate the opportunity to comment on this proposed rule.

Yours sincerely,

Robin G. Todd PhD

President

Maryland Ornithological Society

Ellicott City, MD 21042

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Ellicott City, MD 21042

December 15, 2019

Submit via email: akroadlessrule@usda.gov

To the Forest Service:

The Maryland Ornithological Society (MOS) has the honor of submitting the following comments on a proposed rule to exempt the Tongass National Forest from the national Roadless Area Conservation Rule adopted in 2001 and allow more logging and road-building. The proposed rule is accompanied by a draft environmental impact statement (DEIS).

Members of the MOS have visited the Tongass, as it contains important habitat for birds and other forms of wildlife, such as the Stikine River and Wrangell Island. MOS is a statewide nonprofit organization established in 1945 and devoted to the study and conservation of birds. Currently we have 15 chapters and approximately 2,000 members. Every year MOS members travel to many national forests throughout the United States on birding and nature-watching vacations. We spend dollars on food, lodging, guide services, books and souvenirs to support the local economy wherever we go. Birding is one of the fastest-growing outdoor recreational activities.

MOS was represented at a public meeting hosted by the Forest Service in Washington, D.C., on November 14, 2019. We thank the Forest Service representatives for the lucid explanation of the process for this project and for welcoming public participation.

The proposed rule is the result of a request from the Governor of Alaska in January 2018 to exempt the Tongass from the 2001 Roadless Rule. In 2005, during the George W. Bush administration, the Forest Service invited states to petition for exemptions from the nationwide Roadless Rule, but few states chose to submit petitions. Most governors decided the national Roadless Area Conservation Rule was preferable. In the end, only Colorado and Idaho petitioned and received state-specific rules, which kept the forests under the Roadless Rule but carved out areas for more logging and coal mining. To date, no national forest has ever been completely exempted from the national Roadless Rule, as proposed here.

The national Roadless Rule contains exceptions from the fundamental protection policy allowing forest managers to respond to unusual situations such as emergencies involving fire, insects and disease. These exceptions allow very limited logging and road construction when necessary. These have worked well in other states.

Our Recommendation

The Maryland Ornithological Society supports Alternative 1, the no-action alternative. We believe the proposed rule would not serve the national interest. The Tongass is a national forest, not a state forest, so the national interest must be the highest priority. The rule change would weaken the protection given to roadless areas by the national Roadless Area Conservation Rule, and it would set an unacceptable precedent for deleting entire national forests from the protection of the Roadless Rule. The proposed rule should be rejected. Logging in the Tongass should be restricted to areas that are not within inventoried roadless areas and that are already penetrated by roads. The allowable sale quantity should be set at a level that is sustainable over the long term without cutting into the pristine rainforest or degrading wildlife and fish habitat values. That approach is taken in the 2016 Land and Resource Management Plan, as provided in Alternative 1.

Alternatives

The DEIS presents six alternatives. Alternative 6, designated as the agency's preferred alternative, is the proposed rule completely exempting the Tongass from the Roadless Rule. Alternative 1 is the no-action alternative, by which the forest would continue to be managed under the 2016 Land and Resource Management Plan. Alternatives 2, 3, 4 and 5 remove various acreages from roadless area status, make various acreages eligible for timber harvest, and allow various mileages of road construction.

Wildlife Values

The Tongass is known for its bird populations, including over 300 species, of which 160 nest here[1]. The diverse bird life is supported by diverse habitats ranging from saltwater flats to ancient conifer forests, muskeg and alpine areas. Waterbirds are of interest throughout the coastline, with important concentrations at points such as the mouth of the Stikine River. Tongass old-growth forests provide essential nesting habitat for the Queen Charlotte Goshawk, a subspecies endemic to the coast of southeast Alaska and British Columbia. Old-growth forests also provide habitat for Marbled Murrelet and Northern Goshawk. These forests also support all five species of Pacific salmon, brown (grizzly) bears, wolves, and Sitka black-tailed deer

Current Status

The Tongass is our nation's largest national forest, with 17 million acres, of which 5.7 million has been designated as wilderness. Inventoried roadless areas subject to the Roadless Rule total 9.2 million acres. The forest extends some 500 miles along the coast of southeast Alaska from Yakutat Bay on the north, past Juneau, Sitka and Ketchikan to the Canadian border on the south. Large areas have already been logged - half a million acres over the past 50 years, by some estimates. The inventoried roadless areas of the Tongass may contain as much as 2.5 million acres of old-growth and 190,000 acres of large-tree old-growth.

Climate Change

The alternatives presented in the DEIS do not recognize the value of the Tongass forest against global warming. A cursory discussion (DEIS page 3-127) dismisses the impacts of logging as a factor. And yet the intact forest of the Tongass stores more carbon than any other forest in the nation. Trees play a vital role in climate change by sequestering, or storing, carbon when they absorb carbon dioxide. As the nation's largest national forest, the Tongass should be an important part of our national strategy against global warming. This benefit of the intact forest could match or equal the value of the timber proposed to be cut.

Timber Sales

The Tongass is now being managed under a Land and Resource Management Plan that was adopted by the

Forest Service in 2016 after consulting with diverse stakeholders in southeast Alaska[2]. One of its principles is to transition the timber industry out of logging old-growth forests in favor of younger growth.

The proposed rule would expose an added 185,000 acres of the Tongass to logging. We believe such an expansion of timber sales would be rejected out of hand if proposed in any other national forest. The time for vast expansion of logging in roadless areas has long passed. There is a national consensus that the values of roadless areas deserve to be protected.

The impacts of an expanded logging program are unacceptable. The proposal would mean the loss of a great national asset and degradation of its wildlife values. Moreover, logging on the Tongass actually costs the taxpayers money, as the government expenditures exceed the amount received through timber sales.

Economic Values

The proposed rule change does not reflect the economic values of the fisheries and tourism industries that depend on the Tongass. Southeast Alaska employment earnings data for 2018 credit the visitor industry with \$249.3 million, the seafood industry with \$237.4 million, the timber industry with only \$18.7 million.[3]

Over the past 60 years the tourism sector has become a huge economic contributor here. The Tongass is traversed by cruise ship routes that bring more than a million visitors every year[4], who come from all over the United States and many countries abroad to see these wild lands and their wildlife. Specialized tours devoted to birds and wildlife have become popular. Members of MOS have been among the visitors coming to the Tongass to see its diverse birds and mammals.

The Tongass produces on average 28 percent of Alaska's annual commercial salmon catch and 25 percent of the entire west coast annual harvest. The Forest Service has estimated that the salmon industry generates \$986 million annually.

We believe that watchable wildlife, heritage tourism, and the economic benefits of not allowing a huge expansion of logging in favor of tourism-related infrastructure development as provided for in the 2016 Land and Resource Management Plan will prove to be more valuable and more sustainable than the alternatives that would expand roads and logging.

We favor preserving local natural resource-based economies and generations-old traditions. With careful planning and execution, these industries can remain an integral and essential part of evolving tourism-based economic development, and both sectors can flourish.

We are aware that past timber sales on the Tongass have often brought a minimal return to local communities in exchange for the loss of their forests. Round, unprocessed logs were being exported instead of being processed locally to support a diverse timber-products industry. The timber sales were not resulting in the greatest economic benefit of income and jobs that could have been realized if the timber were supporting local and regional industries. If timber is to be harvested from the Tongass, it should be at a level that can be sustained in the long term, and it should be supporting local economies at the maximum level possible, as provided for in the 2016 Land and Resource Management Plan.

Thank you for considering our views.

Sincerely,

[Position]

Robin G. Todd PhD

President

Maryland Ornithological Society

[1] Source: Ecological Atlas of Southeast Alaska, page 110,
http://ak.audubon.org/sites/g/files/amh551/f/seak_atlas_ch05_birds_200dpi.pdf

[2]https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd527907.pdf

[3] Southeast Alaska by the Numbers 2019, page 5:
<http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>

[4] Source: Cruise Lines International Association Alaska, <http://www.cliaalaska.org/economy/alaska-cruise-history/>

[Position]