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Alaska Roadless Rule

USDA Forest Service

PO Box 21628

Juneau, AK 99802-1628

Via: www.fs.usda.gov/project/?project=54511

RE: Comments on the Proposed Alaska Roadless Rule and Draft Environmental Impact Statement

Dear Ecosystem Planning and Budget Staff,

Please accept these comments submitted on behalf of Trout Unlimited (TU) on the Draft Environmental Impact Statement (DEIS) and proposed rule for the Alaska-Specific Roadless Area Conservation Rule.

TU is the nation's largest sportsman's organization dedicated to coldwater conservation with more than 400 chapters and more than 300,000 supporters nation-wide. TU has more than 22,000 supporters in Alaska that are passionate anglers, lodge owners, fishing and hunting guides, and commercial fishermen, among other various occupations. In addition to members in more remote parts of the state, TU has active chapters in Juneau, on the Kenai Peninsula, in Anchorage and the Mat-SU, and in Fairbanks. Many of TU's members rely on the important fish, wildlife and water resources found on the Tongass and Chugach National Forests for fishing, hunting, recreation, and for employment in related industries such as fishing and tourism. From Prince of Wales Island and Misty Fjords in the south, to Yakutat and the Situk River in the north, the Tongass is a popular destination for anglers and hunters because of its salmon and steelhead runs, cutthroat trout, Dolly Varden, Sitka Black-tail deer, black bear, unique karst features, numerous public use cabins, and growing visitor services infrastructure. Likewise, the Chugach is immensely popular for residents and visitors for its fishing, hunting and outdoor recreation opportunity. In addition to our base of sport anglers, outfitters and guides, TU's membership also includes commercial fishers, Alaska Natives, small business owners, and Alaskans from a variety of walks of life.

TU has a long history of working collaboratively with the Forest Service and other stakeholders on the Tongass and elsewhere throughout the National Forest System. TU, in partnership with the Forest Service and The Nature Conservancy, played a major role in the Sal Creek restoration project on Prince of Wales Island, which was completed more than ten years

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ago and helped lay the foundation for future partnership and restoration projects throughout the forest. In addition to various watershed restoration and aquatic organism passage projects throughout the Tongass, TU has been an active participant in a variety of collaborative and partnership groups active in Southeast Alaska, including the Southeast Alaska Fish Habitat Partnership and the Tongass Transition Collaborative, among others. We are actively seeking opportunities to expand our partnership with the Forest Service to the Chugach. Partnering with the Forest Service is critical to TU and to its ability to fulfill its mission. TU is committed, through the investment of significant staff and financial resources, to protecting and restoring important fish, wildlife and water resources on the Tongass, and to ensuring the region's unique wild salmon resources continue to serve as the economic, cultural and spiritual foundation of Southeast Alaska.

We commend the Forest Service for its efforts in recent years to advance the transition and move toward sustainable forest management and away from large-scale old-growth logging on the Tongass. Improving protections for important fish and wildlife habitat, enhancing visitor services, and supporting a sustainable forest products industry with a future in sustainable young-growth management will enable the Forest Service to increase its support for Southeast Alaska's rural communities and be responsive to the needs of the region. Large-scale and unsustainable old-growth timber sales undermine the region's largest job-producing industries, cause unnecessary and irreparable harm to important fish and wildlife habitat, and is an antiquated practice that would not exist if not for massive taxpayer subsidy.

I. Fishing and Recreation are the Tongass' most Important Forest Products.

The Tongass is the nation's top salmon-producing forest and a popular destination for visitors from around the globe.¹ It's many productive salmon streams, important fish and wildlife habitat, and beautiful scenery are the foundation for Southeast Alaska's local economy. Sport, commercial and subsistence fishing in Southeast Alaska contributes \$1 billion annually to the regional economy and accounts for 10% of Southeast Alaska's employment.² In addition to this, more than 1.3 million out-of-state visitors flock to the Tongass each year, making tourism the largest source of private-sector jobs and earnings in southeast Alaska.³ Together, the visitor and seafood industries provide 26% of all regional employment.⁴ These industries have their foundation in healthy watersheds, in-tact fish and wildlife habitat, natural scenic beauty

¹ U.S. Forest Service, Tongass Salmon Factsheet (Mar 2017) Attachment 1, available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd554592.pdf.

² TCW Economics, Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska, prepared for Trout Unlimited Alaska 16 (July 2010) Attachment 2, available at <http://www.tu.org/sites/www.tu.org/files/documents/EconReportFull.pdf>. The number of jobs supported by salmon fishing and its economic contribution are likely to be even greater today than was indicated since these figures were calculated using data from 2007 and the economy and salmon prices have continued to increase in years since.

³ Rain Coast Data, Southeast Alaska by the Numbers 2019, prepared for Southeast Conference at 7 (Sep. 2019) Attachment 3, available at

<http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>.

⁴ Id. at 5.

and untouched landscapes, and depend heavily on protections afforded to inventoried roadless areas by the 2001 Roadless Area Conservation Rule.

Fishing and tourism far outpace other private-sector sources of employment and earnings. They provide a steady and reliable source of employment and earnings for many Southeast Alaskan communities. While logging once played a historically important role in the economy of Southeast Alaska, current timber industry employment accounts for just 0.7% of regional jobs.⁵ Despite decreases in Southeast Alaska's timber industry, in the years after the 2001 Roadless Rule was initially promulgated Southeast Alaska's population increased 7 percent from 2000 to 2012 and personal income increased by 17 percent over the same period.⁶ Per capita income for Southeast Alaskans outpaces statewide and national averages while unemployment rates remain lower than statewide or national averages.⁷ Southeast Alaska's economy is buoyed by its healthy fish and wildlife habitat, productive salmon streams and scenic beauty. Managing the Tongass with fish, wildlife and visitor services at the forefront is the key to ensuring local communities and economies are strong and stable.

II. Roadless Area Protections are Essential to the Local Economy and a Successful Transition.

Two key developments in the Tongass over the past nearly two decades are responsible for the growth and strength of Southeast Alaska's fishing and tourism industries. First, the 2001 Roadless Rule was put in place to conserve the remaining wild landscapes and unroaded portions of the Tongass, which are the core of the local fishing and tourism industries. While various unsuccessful litigation efforts have been mounted against the 2001 Roadless Rule on the Tongass, and a Tongass exemption was temporarily in place before the Ninth Circuit Court of Appeals ruled it to be unlawful, the 2001 Roadless Rule has successfully conserved inventoried roadless areas on the Tongass as the law of the land for the vast majority of the past 18 years. Because of the 2001 Roadless Rule, inventoried roadless areas remain unimpacted by industrial old-growth logging and unnecessary road construction, remain reliably productive as cornerstones of the region's fishing and tourism industries, and remain accessible for fishing, hunting, recreation, guiding, and tourism.

Second, through the collaborative efforts and hard compromise of the Tongass Advisory Committee (TAC) and the 2016 amendment to the Tongass Land Management Plan (TLMP), the Forest Service has a roadmap for aligning its management of the Tongass with the public interest and the economic realities of the region. Successfully implementing this collaborative vision would allow the Forest Service to align the Tongass with the public's needs, support a sustainable young-growth forest products industry, and protect the best remaining fish and wildlife habitat on the forest—including roadless areas, the Tongass 77, and TNC/Audubon Conservation Priority Areas.

⁵ Id.

⁶ USDA, Tongass Land and Resource Management Plan Final Environmental Impact Statement Plan Amendment, R10-MB-769e at 3-478 (June 2016) hereinafter 2016 TLMP FEIS.

⁷ Id. at 3-478 to 479.

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Timber planning, including the current proposal to repeal protections for roadless areas on the Tongass, too often comes at the expense of the region's strong economic base of fisheries and tourism. Once-productive salmon streams no longer support abundant salmon runs and ample wildlife populations when clearcut logging disrupts recruitment of large-woody debris, erosion overburdens nearby streambeds, roads cross streams and cut off

salmon migration to important spawning or rearing habitat, or second-growth stands become so overgrown they fail to provide meaningful winter habitat for wildlife. Tourists and recreationists don't travel to the Tongass to see and hike through large swaths of clearcut lands. They come to take in its scenic beauty and in-tact landscapes. Each of these factors contributed to why the Forest Service adopted the original 2001 Roadless Rule and remain true today.⁸

The past 60 years of industrial logging on the Tongass has targeted the rarest and most productive stands of large-tree old-growth forest. High-grading has reducing the highest-volume contiguous old growth on the Tongass by 66 percent forest-wide.⁹ On northern Prince of Wales Island, where large-scale old-growth logging has been most intense, 94 percent of the contiguous large-tree old-growth stands have been logged since 1954.¹⁰ This contiguous large-tree old-growth forest, which historically covers less than five percent of the Tongass, is among the most valuable habitat for fish and wildlife. Past logging and road building has left a legacy on the Tongass where, according to Forest Service estimates, roughly 65 watersheds are in need of significant restoration with an estimated cost of more than \$100 million to address the backlog of unmet watershed restoration needs.¹¹ The backlog of road maintenance needs on Alaska's National Forests amounts to \$68 million, begging the question of why we would compound these problems through expanded road construction in new areas.¹² Approximately a third of all instances on the Tongass where roads intersect streams fail to meet applicable standards for salmon migration.¹³

III. The Propose Rule is out of Touch with the Needs of the Public.

The overwhelming weight of public input recognizes the extraordinary value of roadless areas on the Tongass and a desire to keep the 2001 Roadless Rule's important protections in

⁸ See Special Areas; Roadless Area Conservation, 66 Fed. Reg. 3244, 3245-47 (Jan. 12, 2001).

⁹ Albert, D. M., and J. W. Schoen, Use of Historic Logging Patterns to Identify Disproportionately Logged Ecosystems within Temperate Rainforests of Southeastern Alaska, 27 Conservation Biology 4 at 779-780 (2013) Attachment 4; Albert, D. M., and J. W. Schoen, A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. eds J. W. Schoen, and E. Dovichin. Audubon Alaska and The Nature Conservancy (2007), available at <https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

¹⁰ Id.

¹¹ USDA, Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013, R10-MB-734 at 11 (Nov. 2011) Attachment 5, available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5339075.pdf.

¹² U.S. Forest Service, Questions for Mr. Quigley at 1 (June 2018) Attachment 6.

¹³ U.S. Forest Service, 2016-2017 Tongass National Forest Monitoring and Evaluation Report at 3 Attachment 7.

place. Numerous tribes and communities have passed resolutions or spoken out in favor of protecting roadless areas on the Tongass. Many affected businesses in the fishing, hunting and tourism industries also support

protecting roadless areas.¹⁴ Public comment at the public meetings for the proposed exemption overwhelmingly favored retaining the 2001 Roadless Rule. In some communities, 100% of the public comment supports protecting roadless areas. Recent polling shows 79% of Alaskans and a comparable number of southeast Alaskans want to either keep the 2001 Roadless Rule as it is, or to make minor changes that are offset by increased conservation measures for important fish and wildlife.¹⁵ Similarly, the majority of public comments to the Forest Service during the scoping period opposed changing the 2001 Roadless Rule for Alaska.¹⁶ The scientific community also recognizes the importance of the 2001 Roadless Rule and the extraordinary value of the remaining big-tree old-growth, and has repeatedly called on the Forest Service to end its old-growth timber sale program.¹⁷

When evaluating the benefits from the Tongass to society, the Forest Service and the State of Alaska are placing far too much emphasis on traditional extractive resources while largely ignoring benefits from fish, wildlife, subsistence, recreation, water resources, and carbon storage. By far the most valuable activities occurring on the Tongass are derived from intact fish and wildlife habitat and wild scenery. This is true throughout the National Forest System, but is especially relevant in Southeast Alaska where the Tongass comprises such a large portion of the land base and where the forest's roadless qualities play such an integral role in southeast Alaska's businesses, economy and lifestyle. Maximizing the benefits from the Tongass to the public requires the Forest Service to manage the Tongass in a way that prioritizes the many contributions of fish, wildlife and visitor services—all of which primarily derive from inventoried roadless areas.

In addition to safeguarding important fish, wildlife, subsistence, and recreational resources throughout roadless areas in the Tongass, the 2001 Roadless Rule also provides reasonable accommodation to community development and infrastructure needs. The 2001 Roadless Rule provides access for mining, energy, and community infrastructure projects. It allows forest health, recreation, and cultural activities. The Kake-Petersburg Intertie and the Blue Lake Hydropower Project Expansion, which opponents of the 2001 Roadless Rule often cite as being obstructed by the rule, are explicitly allowed by court order along with a variety of

14 See Business Letter to Secretary Perdue and Chief Christiansen (Dec. 16, 2019) Attachment 8.

15 See Tulchin Research, Poll Findings: Alaska's Tongass National Forest at 7 (May 2019) Attachment 9, available at http://www.americansalmonforest.org/uploads/3/9/0/1/39018435/ak_tongass_trout_unlimited_final.pdf.

16 U.S. Forest Service, Alaska Roadless Rule Scoping Period: Written Public Comment Summary at 2 (Feb. 2019) available at https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4616651.pdf.

17 See Jack Ward Thomas and Mike Dombeck, Seattle Times Op Ed, Declare harvest of old-growth off-limits and move on (Aug 23, 2003); Letter to the President by 78 North American Scientists (lead signatories were Jack Ward Thomas and Mike Dombeck) calling for a national old growth policy to protect the remaining old growth on national forest lands throughout the US (June 25, 2014); Letter to Secretary Vilsack from 200+ North American Scientists urging a quick transition out of old-growth logging on the Tongass National Forest (October 15, 2014); Joint Society letter to Secretary Vilsack from American Fisheries Society (AK Chapter), American Ornithologist's Union, American Society of Mammalogists, Ecological Society of America, Pacific Seabird Group, Society for Conservation Biology, The Wildlife Society (January 20, 2015).

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other high-profile projects.¹⁸ As of June, 2019, all 58 applications submitted for projects in roadless areas in Alaska had been approved, most gaining approval within a month.¹⁹ The majority of these applications pertain to

surface exploration of potential mining and hydropower projects, but they also include road realignment and reconstruction projects, an aerial tram, a geothermal project, personal use of timber, and a variety of other projects. In October, 2018, the process for approving these projects was further streamlined when Forest Service Chief Christiansen delegated authority to approve project requests to the Regional Foresters. 20

In many regards, Southeast Alaska has already transitioned. More than one-in-four jobs in Southeast Alaska are in either the fishing or tourism industries.²¹ Even when timber from private and state lands is included, the timber industry in Southeast Alaska accounts for just a few hundred jobs.²² While timber harvesting once played a historically important role in the economy of Southeast Alaska, the future of the Tongass timber program is in planning and implementing appropriately-scaled timber sales that support and encourage local manufacturing of young-growth forest products while also restoring managed stands in previously-harvested areas. If the Tongass is to truly support the local and regional economy, its management—and especially the management of its roadless areas—must place fishing and tourism industries at the forefront and to in every way possible avoid or minimize impacts to fish and wildlife habitat.

Exempting the Tongass, or even portions of inventoried roadless areas on the Tongass, from the protections afforded by the 2001 Roadless Rule will undercut the Tongass Transition, erode public confidence and trust in the Forest Service, serve as unnecessary obstacles to the creation of a sustainable forest products industry in the region, and undermine the economic lynchpins of Southeast Alaska's fishing and tourism economy. As the Forest Service itself notes, outfitters, guides and recreation-related businesses are the losers as a result of this rulemaking, likely losing hundreds of thousands of dollars per year, if not more.²³

For at least a decade, from the Log Jam timber sale in 2009 to today's Central Tongass Project, the Forest Service has justified old-growth timber sales on the Tongass as "bridge timber" that are necessary to encourage the transition to young-growth forest products. A similar line of thinking permeated the TAC and the 2016 TLMP amendment, where industrial old-growth logging was justified to maintain the existing timber industry and capacity only until large volumes of young-growth timber becomes commercially viable and the arrival of the highly anticipated "wall of wood."

18 See U.S. District Court, District of Alaska, Judgement, *Organized Village of Kake v. USDA*, 1:09-cv-00023-JWS at 2-3 (May 24, 2011) Attachment 10.

19 U.S. Forest Service, *Frequently Asked Questions Regarding Inventoried Roadless Areas 6* (Jan. 2018) Attachment 11; U.S. Forest Service, *supra* note 12, at 1.

20 U.S. Forest Service, *supra* note 12, at 1.

21 See *Rain Coast Data*, *supra* note 3, at 4.

22 See *id.* at 4.

23 U.S. Forest Service, *Alaska Roadless Rulemaking Regulatory Impact Assessment and Cost-Benefit Assessment 32* (Oct. 2019) available at http://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4876769.pdf.

Exempting the Tongass from the 2001 Roadless Rule disrupts the transition and greatly expands the suitable old-growth timber base, undoes years of progress built on public trust and collaboration, will have irreversible

negative impacts to the remaining important fish and wildlife habitat on the forest, and set the transition and the Tongass back decades. Rather than creating large new exemptions to roadless area protections that encourage the timber industry to dig in its heels against the tides of change and to continue cutting as much valuable old-growth timber as possible, the Forest Service should conserve roadless areas on the Tongass and encourage investment in transition technologies and entrepreneurship within the Tongass timber industry.

IV. The Forest Service has Failed to Provide Adequate Opportunity for Public Input and Failed to Address Issues Raised in Scoping.

The Forest Service has needlessly rushed this rulemaking, has not provided adequate notice and opportunity for public input, and has not been responsive to the input it has received. Unlike the processes employed in development of the original 2001 Roadless Rule or the Colorado or Idaho state-specific rules, all of which allowed for diverse stakeholder input from the outset, the rulemaking for the Alaska Roadless Rule has been driven by special interests and the State of Alaska.

The Forest Service has improperly relied on the State of Alaska's Citizen Advisory Committee (CAC) as if it was a duly convened federal advisory committee, which it is not. The CAC was hastily convened without any of the procedural safeguards that apply to committees convened through the Federal Advisory Committee Act. Its membership failed to include anyone from the tourism or visitor services industry, failed to include anyone operating on the Tongass through a special use permit, failed to include anyone from the sport fishing or hunting industries, failed to include anyone with scientific or technical expertise, and was heavily skewed toward resource extractive industries such as logging.²⁴ Many of its members had limited understanding of the Roadless Rule and did not have the resources to make an informed decision, such as information on existing commercial operators on the forest. As such, it had only a narrow view of the issues at stake and a relatively poor understanding of how the Roadless Rule functioned on the Tongass.

Despite these shortcomings, the Forest Service is treating the CAC as if it was a federal advisory committee. Each of the alternatives closely mirror the options forwarded to it by the CAC, even where those options conflict with input from the public, other cooperating agencies, or from the TAC's recommendations during the 2016 TLMP amendment. In addition, as has been widely reported, it's clear Alaska Governor Dunleavy convinced President Trump to direct

²⁴ See Alaska Roadless Rule Citizens Advisory Committee, Final Report to the Governor and State Forester, State of Alaska at 15 (Nov. 2018) available at https://s31207.pcdn.co/wp-content/uploads/sites/6/2019/11/Alaska-Roadless-Rule-Citizen-Advisory-Committee-Final-Report_11.21.2018.pdf.

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the Forest Service to undertake a full exemption even before the DEIS was made public.²⁵ This is predecisional. The Forest Service has allowed the State of Alaska to unduly influence this process while ignoring the overwhelming public comment in support of protecting roadless areas on the Tongass.

V. The Proposed Rule will not be "durable" and fails to Satisfy the Purpose and Need of the Rulemaking.

The purpose and need for this rulemaking is to achieve "a long-term, durable approach to roadless area management . . . that accommodates the unique biological, social and economic situation in and around the Tongass."²⁶ In order to satisfy this purpose and need, any new rule, if one is promulgated, must have broad support from diverse stakeholders throughout the region, including conservation interests and the fishing and tourism industries, while also being responsive to criticisms of the 2001 Roadless Rule, whether real or

perceived. Unfortunately, the Forest Service has taken little effort to address criticisms of the 2001 Roadless Rule that are merely of perception and that could be remedied through efforts short of a new rulemaking and has proposed the most extreme option available. The Forest Service is advancing a proposed rule that is the product of undue political pressure from special interests instead of collaboration and compromise.

When the Forest Service first announced it was considering changes to the 2001 Roadless Rule in Alaska, TU was among a group of businesses and organizations that reached out to the Forest Service and State of Alaska expressing interest in finding a compromise that retained the core conservation principles of the Roadless Rule while alleviating concerns of its critics. At its core, while we support the 2001 Roadless Rule and do not believe an Alaska-specific rule is necessary, our suggestion was to develop a rule that: (1) provided a limited exemption for the "roadless roadless"; (2) expanded roadless area protections to those portions of the Tongass 77 and TNC/Audubon Conservation Priority Areas that are outside inventoried roadless areas; and (3) clarified that roads and tree harvest are allowed where reasonably necessary for essential infrastructure projects, energy generation projects, mining, and transportation projects.

Had the Forest Service developed and advanced an alternative based on input through a robust public process like that used for the Idaho or Colorado rules, it could have arrived at a durable solution. Unfortunately, the Forest Service has instead bent to the will of the State of Alaska and the old-growth logging industry, which are unwilling to accept anything less than a full repeal of the 2001 Roadless Rule on the Tongass. Conflict and controversy are mounting as a result and, if the proposed rule becomes final, litigation is sure to follow. Rather than

25 See The Washington Post, Trump Pushes to Allow new Logging in Alaska's Tongass National Forest (Aug. 27, 2019) Attachment 12, available at https://www.washingtonpost.com/climate-environment/trump-pushes-to-allow-new-logging-in-alaskas-tongass-national-forest/2019/08/27/b4ca78d6-c832-11e9-be05-f76ac4ec618c_story.html.

26 U.S. Forest Service, Draft Environmental Impact Statement Rulemaking for Alaska Roadless Areas at ES-2 (Oct. 2019) hereinafter DEIS.

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achieving a durable and lasting result that puts conflict behind us, this proposed rule douses the remaining embers of the timber wars with fuel.

VI. The Tongass 77 and TNC/Audubon Conservation Priority Areas are Important for Fish and Wildlife and Should be Conserved.

Various areas have been identified as especially important for fish and wildlife and deserve continued protection under any future Alaska-specific roadless rule. These areas include the Tongass 77 (commonly referred to as the T77) and areas identified by the Audubon/TNC Eco-regional Conservation Assessment as either Conservation Priority or Core Integrated Management Watersheds (commonly referred to as TNC/Audubon Conservation Priority Areas). These areas, along with roadless areas, were specifically recognized by the TAC, which recommended they be off-limits to future old-growth logging.²⁷ The 2016 TLMP amendment sought to implement the TAC's recommendations by identifying these areas as NOT suitable for old-growth logging.²⁸

Any Alaska-specific roadless rule should reinforce the TAC recommendations and the 2016 TLMP amendment by protecting the entire Tongass 77 and all TNC/Audubon Conservation Priority Areas, including those that are outside inventoried roadless areas. These protections should be as robust and as flexible as protections afforded inventoried roadless areas by the 2001 Roadless Rule while still allowing recreation, outfitters and guides,

cultural and subsistence activities, and projects designed to restore forest health. If the Forest Service finalizes an Alaska-specific Roadless Rule, TU encourages extending the Watershed Priority to Tongass 77 and TNC/Audubon Conservation Priority Areas outside the existing roadless inventory, as is proposed as a component of Alternative 3.

The Tongass 77 are the "best of the best" from the thousands of salmon and trout watersheds on the Tongass. These areas were identified through a comprehensive process where researchers from the Alaska offices of the Audubon Society, The Nature Conservancy and Trout Unlimited, in consultation with federal and state biologists and various community and business stakeholder groups, identified the most important salmon-producing watersheds that lacked watershed-scale protections. Now narrowed down to 73 watersheds comprising

27 Tongass Advisory Committee, Tongass Advisory Committee Final Recommendations at 13 (Dec. 2015) Attachment 13, available at http://www.merid.org/~media/Files/Projects/tongass/December%202015%20Meeting/Tongass%20Advisory%20Committee%20Final%20Recommendations_Dec%202015.pdf. While some former members of the TAC appear to now characterize the TAC's final recommendations as not unanimous or as not supporting the conclusion that the Tongass 77 should be off limits to old-growth logging, those comments contradict the well-established record of the TAC and the 2016 TLMP amendment. As the TAC's final recommendations clearly state, "The TAC agrees that the USFS should: . . . Limit the old growth timber base to the current definition of Phase I lands outside of The Nature Conservancy (TNC)/Audubon conservation priority areas, Tongass 77 (T77) watersheds and Inventoried Roadless Areas." Id. While the TAC was instructed by the USDA and Forest Service to limit its recommendations to what was possible within the 2001 Roadless Rule, no similar direction was provided to the TAC for the Tongass 77 or TNC/Audubon Conservation Priority Areas, which were taken up by the TAC on its own accord.

28 USDA, Tongass National Forest Land and Resource Management Plan, R10-MB-769g at A-5 (June 2016) available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd527907.pdf.

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not quite 1.9 million acres,²⁹ the Tongass 77 form the backbone of Southeast Alaska's salmon fishery and the play a vital role on Southeast Alaska's local economy. The Tongass 77 enjoys support from more than 300 businesses and organizations, most of which are based in Southeast Alaska.³⁰ 7,233 individuals, 3,636 of which resided in Southeast Alaska, voiced support for protecting the Tongass 77 and making these areas off limits to logging during planning for the 2016 TLMP amendment.³¹

Like the Tongass 77, TNC/Audubon Conservation Priority Areas are hugely important to local fish and wildlife populations. These areas were identified through a thorough peer-review process conducted by scientists from Audubon Alaska and The Nature Conservancy.³² These areas are the most ecologically valuable areas for a diverse array of plant and animal species and their conservation is essential to the ecological health and function of Southeast Alaska.

Fish and wildlife, and Southeast Alaska's broad expanses of untracked land and scenic beauty, are the underpinnings of our local economy, culture, and community. Salmon and trout—and the communities, cultures and economies they sustain—require clean, healthy watersheds for spawning, rearing and migrating. Based on the outstanding fish and wildlife habitat values in the Tongass 77 and TNC/Audubon Conservation Priority Areas, and their incredible importance to local communities and the region's economy, these areas deserve special protection from future development in any new Alaska-specific rule developed by the Forest Service.

VII. The DEIS Fails to Take a Hard Look at Impacts to Fish and their Habitat.

The National Environmental Policy Act (NEPA) requires the Forest Service to take a hard look at the potential direct, indirect and cumulative effects of the proposed rule.³³ This must include effects and impacts that are "ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative."³⁴ Yet, the DEIS consistently underplays the potential impacts, makes numerous conclusions that are unsupported by the best available science, and fails to incorporate numerous relevant scientific studies. Because of these shortcomings, the DEIS is inadequate for an informed impacts analysis.

29 See Trout Unlimited, *The Tongass 77, Protecting Southeast Alaska's Best Salmon Watersheds* (Mar. 2, 2016) Attachment 14, available at http://www.americansalmonforest.org/uploads/3/9/0/1/39018435/t77_4-pager_summary_-_20160302.pdf.

30 See List of Tongass 77 supporters, available at <http://www.americansalmonforest.org/t77-supporters.html>.

31 *Id.*

32 See Albert, D. M., and J. W. Schoen, *A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest.* eds J. W. Schoen, and E. Dovichin. Audubon Alaska and The Nature Conservancy (2007), available at <https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

33 See 40 C.F.R. [sect] 1502.16.

34 *Id.* at [sect] 1508.8.

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The DEIS fails to adequately assess the current status of fishes and fish habitat on the Tongass, to discuss how the current status relates to historic abundance, and to analyze how the proposed action will affect fisheries, fish habitat, and the important waters that support these resources. Underlying the DEIS, and made explicit by various statements of Forest Service officials at public meetings, is the misguided belief that expanding logging and logging roads into roadless areas will have no effect on fish and fish habitat. This assertion is conclusory and unsupported by the scientific record and common sense.

First, the Forest Service seems to take the position that, while the proposed rule will give it more flexibility to plan logging in new places, the exemption will not lead to more logging. The State's petition and the various comments by Alaska's elected officials and industry proponents make clear that the motivation for the exemption is to revitalize and expand the failing old-growth logging industry. The old-growth logging industry has already high graded the economically viable timber stands. Forest wide, 66.5% of the Tongass' contiguous high-volume stands have been logged. On northern Prince of Wales Island, where logging has been most intense, 93.8% of the contiguous high-volume stands have been logged.³⁵ The old-growth logging industry has already cut nearly all the economically viable forest it has access to on the Tongass and must expand into new roadless areas if it is to continue.

Second, the Forest Service maintains TLMP provides a second layer of protection by identifying most roadless areas as "not suitable" for logging. However, as part of this rulemaking the Forest Service also proposes making an administrative change to the forest plan to reclassify 185,000 acres as suitable for logging. 165,000 of those acres are old-growth forest and 20,000 of those acres are young-growth forest, all of which will newly be available for logging if this proposed rule becomes final. Additionally, the Forest Service often amends the Forest Plan on a project-by-project basis to make new areas suitable, which it likely would do in the future to make new lands available for logging beyond the initial 185,000 acres.

Third, the Forest Service suggests that standards and guides in TLMP, such as stream buffers that prohibit logging within 100 feet of a salmon stream, adequately protect salmon even where logging is allowed. However, as we've seen in the Tongass and elsewhere, logging and logging roads lead to sedimentation, higher stream temperatures, lack of large woody debris recruitment, migration barriers, and a variety of other impacts that degrade habitat and reduce salmon productivity. Additionally, standards and guidelines on the Tongass lag behind what the Forest Service requires on other salmon-producing national forests, including those managed under the Northwest Forest Plan where the Forest Service requires 300-foot buffers.

Fourth, although the DEIS seems to acknowledge that roads are the largest source of sediment to salmon streams,³⁶ and a recent monitoring and evaluation report identified a third

35 See Albert and Schoen, *supra* note 9, at 779-780.

36 DEIS at 3-112.

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of all bridges and culverts across salmon streams on the Tongass fail to meet applicable fish passage standards,³⁷ the DEIS fails to assess the impacts associated with additional road construction necessary to support logging activities in new portions of the Tongass. As the DEIS notes, "road-crossing structures have been common partial or complete barriers to fish movement in much of the developed areas where fish are present,"³⁸ "roads pose the greatest risk to fish resources on the Tongass,"³⁹ and "Roads have been found to contribute more sediment to streams than any other land management activity."⁴⁰ Even if the rate of logging stays within the projections contemplated by the 2016 TLMP amendment, for which there is no guarantee, road construction must increase under the proposed rule in order to facilitate logging in areas currently inventoried as roadless. Yet, the DEIS erroneously states that "new road construction would be similar under all alternatives"⁴¹ and that the proposed rule will have "Neutral/No Effect" on fisheries.⁴²

This proposed rule will allow industrial clear-cut logging of old growth forest to expand into new areas. This expansion will require more road construction and reconstruction. Additionally, the rate and footprint of logging operations is likely to increase through subsequent plan amendments and due to new economically viable timber becoming available. These expansion areas will be the best remaining economically viable stands of old-growth forest, which are also the most important places for salmon and other fish and wildlife species. Logging and road building in these expanded areas will impact salmon, resident fishes, nearby wildlife, and their habitat. The Forest Service ignores these realities and fails to take a hard look at these impacts. The DEIS does not satisfy the requirements of NEPA and must be revised.

VIII. The DEIS Fails to Take a Hard Look at Impacts to Tourism and Recreation.

The DEIS and supporting materials fail to account for existing tourism and recreation activities on the Tongass, fail to account for future growth in those activities, and as a consequence fail to take a hard look at reasonably

foreseeable impacts to tourism and recreation. The DEIS lists the small cruise vessel capacity and notes that 242 permitted outfitters and guides operated on the Tongass between 2013 and 2017,⁴³ but somehow concludes the proposed rule will have minimal to no effect on those activities.⁴⁴ Additionally, the DEIS dismisses likely impacts to "other popular recreation and tourism activities, such as saltwater fishing, sea kayaking, and shopping" because they "do not take place on the Tongass" and the forest merely provides "a backdrop for these activities."⁴⁵ This assertion is unsupported.

37 U.S. Forest Service, *supra* note 13, at 3.

38 DEIS at 3-110.

39 *Id.* at 3-112.

40 *Id.*

41 *Id.* at 3-113.

42 *Id.* at 2-25.

43 *Id.* at 3-39.

44 *Id.* at 2-25.

45 *Id.* at 3-41.

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The proposed rule would expand logging and logging roads into new part of the Tongass that are currently undeveloped. Many of these roadless areas are the foundation for local outfitter and guide businesses, tour companies, and are popular with recreationists. Outside of general observations about the volume of use on the Tongass, the Forest Service provides no meaningful accounting of existing or foreseeable future use, where that use occurs on the forest, and makes no meaningful assessment of how that use will be impacted or displaced by expanded logging activities and new logging roads. The Forest Service must undertake a meaningful assessment of how expanding logging activities into new parts of the forest will impact and displace existing forest users. The Forest Service must also consider how this expanded logging will curb growth in the tourism and recreation sector. A new revised or supplemental DEIS is necessary to address these shortcomings.

IX. Additional Specific Comments on the Proposed Rule and Action Alternatives.

TU supports Alternative 1 and encourages the Forest Service to take "no action." However, the following comments are provided on the various action alternatives.

a. "Logical Extensions" Should Avoid the Tongass 77 and TNC/Audubon Priority Areas.

Alternative 3 exempts "substantially-altered roadless areas" and modifies roadless boundaries to allow logging up to the "logical end points of existing road and timber harvest units" in areas currently inventoried as roadless.⁴⁶ These logical extensions are sprinkled throughout the forest. While TU opposes exempting any of the logical extensions, many of them are especially problematic because they are located in high-value areas for fish, wildlife and/or recreation. The below chart outlines the most problematic logical extensions. These logical

extensions should not be included in Alternative 3 or, at a minimum, reduced in size to eliminate the conflict.

1. Timber Harvest and Roads Should not be Allowed for Experimental Forests in Roadless Areas.

Alternatives 2 through 5 would allow timber harvest and road construction or reconstruction in designated experimental forests for research or administration.⁴⁷ However, this allowance is inconsistent with the protection of roadless values and should not be included in the final rule. Any research or administrative activities that rely on timber harvest or road construction and reconstruction should occur outside inventoried roadless areas.

1. Timber Harvest and Roads Should not be Allowed for Fishways, Hatcheries or Aquaculture Facilities.

Alternatives 2 through 5 would allow road construction or reconstruction in conjunction with fishways, hatcheries or aquaculture facilities in roadless areas and/or community priority areas.⁴⁸ However, this allowance is inconsistent with the conservation of roadless values and should not be included in the final rule. Unless the road construction or reconstruction is

⁴⁷ Id. at 2-7.

⁴⁸ Id. at 2-7 and 2-8.

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necessary pursuant to a pre-existing right, any hatcheries or aquaculture facilities should be sited to avoid road construction or reconstruction in roadless areas.

1. Commercial Timber Harvest and Logging Roads Should be Prohibited in Community Priority Areas.

Alternative 3 would allow commercial timber sales and associated logging roads in community priority areas where the volume is less than 1 million board feet (mmbf) of timber.⁴⁹ This leaves the door open for a series of commercial timber sales of unlimited volume and unlimited new road construction so long as each individual sale is less than 1 mmbf. In effect, this invites segmentation, undermines the purpose of community priority areas, and fails to conserve the important roadless values. This language should not be included in the final rule. Commercial timber sales and logging roads should be prohibited in community priority areas.

1. Timber Harvest Associated with Biomass Production Should be Prohibited in

Community Priority Areas.

Alternative 3 would allow timber harvest where "needed for the construction, expansion, utilization or maintenance of . . . biomass heating and energy systems" and "other renewable energy projects" in Community Priority Areas.⁵⁰ If adopted as part of the final rule, this language should be changed to clarify that timber harvest is allowed only when incidental to construction of the generation facility and prohibited if done in order to provide a supply of biomass fuel. Timber harvest to fuel a biomass facility must comply with any and all restrictions applicable to traditional commercial logging activities.

1. Timber Harvest Associated with Alaska Native Customary and Traditional Uses Should be Allowed.

TU supports allowing timber harvest for Alaska Native customary and traditional uses, such as for the harvest of individual trees for totems, in roadless areas when consistent with maintaining and conserving roadless

characteristics. Associated road construction and reconstruction should be prohibited.

1. Timber Priority Alaska Roadless Areas Should not be Allowed.

Alternative 4 would allow timber harvest and road construction or reconstruction in timber priority roadless areas.⁵¹ Establishing Timber Priority Alaska Roadless Areas is inconsistent with the conservation or roadless values and should not be allowed. This roadless

49 Id. at 2-8.

50 Id.

51 Id.

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classification should not be part of the final rule. Commercial logging and logging roads should be allowed only outside inventoried roadless areas.

1. Administrative Changes to TLMP.

Alternatives 2 through 6 propose administrative changes to the 2016 TLMP amendment to change 185,000 acres of the Tongass from not suitable for timber production to suitable.⁵² These changes are inappropriate for this rulemaking. The purpose and need does not contemplate changes to TLMP, this was not an issue significantly raised during scoping, and is not an issue that has been adequately noticed during the public comment period for the DEIS.

The 2016 TLMP amendment was the product of years of collaboration and compromise among diverse stakeholders that struck a careful balance among conservation and resource extraction interests. Unlike the ongoing roadless rulemaking, which relies on input from a non[shy]representative stakeholder group convened by the State of Alaska, the 2016 TLMP amendment is based on recommendations from the TAC, a duly convened federal advisory committee that complied with all procedural and substantive requirements of the federal advisory committee act.⁵³ At its core, the TAC recommended phasing out large-scale old-growth logging over a 16-year period, easing standards and guides to allow increased access to young-growth timber as a way of encouraging the transition away from old-growth logging, and protecting important areas from future logging, including roadless areas, the Tongass 77, and TNC/Audubon Conservation Priority Areas.⁵⁴ The TAC was clear that its recommendations must be taken as a whole and not adopted partially or in a piecemeal manner.

Changing the suitability determination in the 2016 TLMP amendment undermines the robust and collaborative process that was employed in achieving its careful compromise. This is especially true where, as here, the Forest Service proposes changes to the forest plan without undertaking a similarly robust or collaborative process. If the Forest Service desires to undertake changes to the forest plan, it must do so separately from proposed changes to the 2001 Roadless Rule, with proper public notice that such changes are being contemplated, and with a robust process on par with the process used with the TAC.

1. The Final Rule Should not Include Language Affecting the Chugach National Forest.

There is no reason for the Forest Service to include the Chugach National Forest in its final rule and all language affecting the Chugach should be removed. The State of Alaska's petition was clear that it requested action

regarding the Tongass.⁵⁵ It did not request action

52 *Id.* at 2-2.

53 Tongass Advisory Committee, *supra* note 27, at 13.

54 *Id.*

55 Mack, Andrew T, Commissioner Alaska Department of Natural Resources, State of Alaska Petition for USDA Rulemaking to Exempt the Tongass National Forest from Application of the Roadless Rule and other Actions (Jan 2018).

affecting the Chugach.⁵⁶ Similarly, although the Forest Service has often referred to the rulemaking as for an "Alaska Roadless Rule," the Forest Service has given every indication it was limiting its consideration to the Tongass and not considering changes affecting the Chugach. Upon releasing the DEIS, the Forest Service press release repeatedly mentions the Tongass and states "The Chugach National Forest would remain under the 2001 Roadless Rule."⁵⁷

Despite the Petition's clear limitation to the Tongass, and public statements by the Forest Service that proposed changes were limited to the Tongass, the Forest Service has nonetheless proposed changes that significantly undermine roadless area protections on the Chugach. These changes are two-fold:

First, the Forest Service proposes creating a mechanism to allow "administrative corrections" to roadless boundaries in the Chugach following public notice and 30-day comment period.⁵⁸ These changes are unnecessary because the 2001 Roadless Rule clearly contemplates corrections when it defines "inventoried roadless areas" as "Areas identified in a set of inventoried roadless areas maps, . . . or any subsequent update or revision of those maps."⁵⁹ Instead of creating a new regulation for the Chugach and extending the Alaska roadless rulemaking beyond its scope, the Forest Service should work within the existing 2001 Roadless Rule to address any administrative corrections that might be appropriate for the Chugach.

Second, the Forest Service proposes creating a mechanism to modify the classification and boundaries of roadless areas on the Chugach after public notice and a 45-day comment period.⁶⁰ This second provision would create a loophole in roadless conservation so great as to render roadless area protections in the Chugach meaningless. Any future project, even a massive timber sale, could be allowed in roadless areas on the Chugach through a simple reclassification or boundary modification. Except for the requirement for a simple notice and comment period, such as is required for any large project anyway, there is no limit to what can be allowed in roadless areas of the Chugach and no standard for when the reclassification or boundary modification is appropriate. Even if the Forest Service decides to retain the first subpart of the Chugach section, this second provision must be excluded.

Modifying the 2001 Roadless Rule for the Chugach is unnecessary, is inconsistent with the conservation of roadless areas, and is especially inappropriate here since the Forest Service has repeatedly assured the public there will be no changes to the Chugach. If the Forest Service desires to modify how roadless areas on the Chugach are managed, it must initiate a new rulemaking with proper notice and scope to include the Chugach.

56 *See id.*

57 U.S. Forest Service, *USDA Forest Service Seeks Public Comment on Draft Environmental Impact Statement, Alternatives to a Proposed Alaska Roadless Rule at 2* (Oct. 15, 2019) available at https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4876053.pdf.

58 See 84 Fed. Reg. 55528-29 (Oct. 17, 2019).

59 36 C.F.R. [sect] 294.11 (emphasis added).

60 See 84 Fed. Reg. 55529 (Oct. 17, 2019).

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X. Conclusion.

The proposed Alaska Roadless Rule, which would fully exempt the Tongass and create misguided loopholes for the Chugach, is a huge leap backward and risks undoing much of the progress gained through compromise and collaboration in recent years. It turns its back to Southeast Alaska's economic strengths[mdash]fishing, tourism and outdoor recreation[mdash]which now account for 26% of regional employment and \$2 billion to the local economy. It also short changes the values that make the Tongass so unique and valuable to local residents and visitors alike.

Roadless areas on the Tongass are some of the best and most valuable lands on the forest. Many of the most important salmon streams are in roadless areas. Increasingly scarce winter deer range and prime bear habitat is often found in low elevation roadless areas. Roadless areas offer the right combination of beautiful scenery, wild landscapes, fish and wildlife, and access that local residents and the growing tourism and recreation industry demands. The Tongass is a paradise[mdash]not just for Alaskans, but for all Americans. The Forest Service should abandon its proposed exemption and, instead, continue long-standing protections for roadless areas.

Thank you for the opportunity to provide input into this planning process. Please do not hesitate to contact me by email at awilliams@tu.org or by phone at 907.227.1590 if you have any questions.

Sincerely,

Austin Williams

December 16, 2019

The Honorable Sonny Perdue Ms. Vicki Christiansen

U.S. Department of Agriculture U.S. Forest Service

1400 Independence Ave., S.W. 1400 Independence Ave., S.W.

Washington, D.C. 20250 Washington, D.C. 20250

Dear Secretary Perdue and Ms. Christiansen,

We are outfitters and guides, tour operators, gear manufacturers and retailers, sportsmen organizations, and conservation groups that value and depend on the Tongass National Forest. We employ hundreds of southeast Alaskans, have tens-of-thousands of Alaskan supporters, and cater to customers that travel to the Tongass for its world-class fish and wildlife, recreation values, subsistence resources, and for the economic opportunities

roadless areas provide. The proposed Alaska Roadless Rule and decisions about how to manage the Tongass have a direct and profound impact on us, our customers, and our members.

1

The proposed Alaska Roadless Rule, which would fully exempt the Tongass, is a huge leap backward and risks undoing much of the progress gained through hard compromise and collaboration in recent years. It turns its back to the region's economic strengths, fishing, tourism and outdoor recreation, which now account for 26% of regional employment and \$2 billion to the local economy, and short changes the values that make the Tongass so unique and valuable to local residents and visitors alike. Exempting the Tongass from the Roadless Rule unnecessarily courts conflict and empowers the most extreme voices while obstructing more productive and mutually beneficial pathways to the future. The Forest Service should abandon its proposed exemption and, instead, maintain protections for roadless areas within the Tongass.

Many of us work directly with the Forest Service, either through special use permits to operate on the Tongass, as project partners, or as visitors, hunters, anglers, and subsistence users. Our ability to fulfill our missions and meet the needs of our customers, and the Forest Service's ability to meet the needs of the public, are directly tied to one another. Either we succeed as stewards of our public lands together with the Forest Service, or we stand by as turmoil over management decisions grows and forest values are degraded.

Many of the undersigned parties have long supported efforts by the Forest Service to transition the Tongass from unsustainable old-growth logging to management focused on fish and wildlife, tourism and recreation, and a sustainable young-growth forest products industry. We cheered the original transition announcement in 2010, worked tirelessly in support of the 2016 amendment to the Tongass Land Management Plan, and have supported its implementation since. Although compromise can be difficult, the need to move beyond the persistent conflict that has clouded the Tongass for decades is paramount.

Roadless areas on the Tongass are some of the best and most valuable lands on the forest. Many of the most important salmon streams are in roadless areas. Increasingly scarce winter deer range and prime bear habitat is often found in low elevation roadless areas. Roadless areas offer the right combination of beautiful scenery, wild landscapes, fish and wildlife, and access that our growing tourism and recreation industry demands. The Roadless Rule's protections for these unique values give our businesses and organizations a level of certainty upon which we base our business investments and hiring decisions.

The Tongass is a paradise[mdash]not just for Alaskans, but for all Americans. Roadless areas in the Tongass contain much of the region's most productive wildlife habitat, quality salmon habitat and clean water, and recreation opportunity. Any durable and long-lasting solution to the persistent land-management challenges on the Tongass must be based on collaboration and care for the important fish, wildlife, recreation, subsistence and scenic values that make the Tongass unique among our public lands. The proposed Alaska Roadless Rule fails on this measure. We encourage the Forest Service to listen to the overwhelming weight of public comment, the needs of businesses and organizations like ours, and to not exempt the Tongass from the Roadless Rule.

Sincerely,

Above and Beyond Alaska Hatch Outdoors Inc

Becky Janes, Owner Andrew Dickinson, General Manager

Juneau, AK Vista, CA

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[Attachment contains Tongass Salmon Factsheet]

[Attachment contains the technical report, [ldquo]Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska[rdquo]]

[Attachment contains the fact sheets, [ldquo]Southeast Alaska By the Numbers 2019[rdquo]]

[Attachment contains Journal Article titled "Use of Historical Logging Patterns to Identify Disproportionately Logged Ecosystems within Temperate Rainforests of Southeastern Alaska[rdquo]]

[Attachment contains USDA Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013]

[Attachment contains Q&A between Mr. Quigley and USFS]

[Attachment contains 2016-2017 Tongass National Forest Monitoring and Evaluation Report]

[Attachment contains PowerPoint presentation titled "Poll Findings: Alaska Tongass Forest"]

[Attachment contains Case 1:09-cv-00023-JWS Document 85 Filed 05/24/11 Organized Village of Kake, et al. vs. US Department of Agriculture, et al. and State of Alaska and Alaska Forest Association]

[Attachment contains USDA article titled "Frequently Asked Questions Regarding Inventoried Roadless Areas"]

[Attachment contains Washington Post Article titled [ldquo]Trump Pushes to Allow New Logging in Alaska[rsquo]s Tongass National Forest[rdquo]]

[Attachment contains 2015 document titled "Tongass Advisory Committee Final Recommendations"]

[Attachment contains article titled "The Tongass 77 Protecting Southeast Alaska's Best Salmon Watersheds"]

[Position]

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

Alaska Roadless Rule
USDA Forest Service
PO Box 21628

Juneau, AK 99802-1628

Via: www.fs.usda.gov/project/?project=54511

RE: Comments on the Proposed Alaska Roadless Rule and Draft Environmental Impact Statement

Dear Ecosystem Planning and Budget Staff,

Please accept these comments submitted on behalf of Trout Unlimited (TU) on the Draft Environmental Impact Statement (DEIS) and proposed rule for the Alaska-Specific Roadless Area Conservation Rule.

TU is the nation's largest sportsman's organization dedicated to coldwater conservation with more than 400 chapters and more than 300,000 supporters nation-wide. TU has more than 22,000 supporters in Alaska that are passionate anglers, lodge owners, fishing and hunting guides, and commercial fishermen, among other various occupations. In addition to members in more remote parts of the state, TU has active chapters in Juneau, on the Kenai Peninsula, in Anchorage and the Mat-SU, and in Fairbanks. Many of TU's members rely on the important fish, wildlife and water resources found on the Tongass and Chugach National Forests for fishing, hunting, recreation, and for employment in related industries such as fishing and tourism. From Prince of Wales Island and Misty Fjords in the south, to Yakutat and the Situk River in the north, the Tongass is a popular destination for anglers and hunters because of its salmon and steelhead runs, cutthroat trout, Dolly Varden, Sitka Black-tail deer, black bear, unique karst features, numerous public use cabins, and growing visitor services infrastructure. Likewise, the Chugach is immensely popular for residents and visitors for its fishing, hunting and outdoor recreation opportunity. In addition to our base of sport anglers, outfitters and guides, TU's membership also includes commercial fishers, Alaska Natives, small business owners, and Alaskans from a variety of walks of life.

TU has a long history of working collaboratively with the Forest Service and other stakeholders on the Tongass and elsewhere throughout the National Forest System. TU, in partnership with the Forest Service and The Nature Conservancy, played a major role in the Sal Creek restoration project on Prince of Wales Island, which was completed more than ten years

Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization

Alaska Office: 3105 Lake Shore Dr. Suite 102B, Anchorage, AK 99517

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ago and helped lay the foundation for future partnership and restoration projects throughout the forest. In addition to various watershed restoration and aquatic organism passage projects throughout the Tongass, TU has been an active participant in a variety of collaborative and partnership groups active in Southeast Alaska, including the Southeast Alaska Fish Habitat Partnership and the Tongass Transition Collaborative, among others. We are actively seeking opportunities to expand our partnership with the Forest Service to the Chugach. Partnering with the Forest Service is critical to TU and to its ability to fulfill its mission. TU is committed, through the investment of significant staff and financial resources, to protecting and restoring important fish, wildlife and water resources on the Tongass, and to ensuring the region's unique wild salmon resources continue to serve as the economic, cultural and spiritual foundation of Southeast Alaska.

We commend the Forest Service for its efforts in recent years to advance the transition and move toward sustainable forest management and away from large-scale old-growth logging on the Tongass. Improving protections for important fish and wildlife habitat, enhancing visitor services, and supporting a sustainable forest products industry with a future in sustainable young-growth management will enable the Forest Service to increase its support for Southeast Alaska's rural communities and be responsive to the needs of the region. Large-scale and unsustainable old-growth timber sales undermine the region's largest job-producing industries, cause unnecessary and irreparable harm to important fish and wildlife habitat, and is an antiquated practice that would not exist if not for massive taxpayer subsidy.

I. Fishing and Recreation are the Tongass' most Important Forest Products.

The Tongass is the nation's top salmon-producing forest and a popular destination for visitors from around the globe.¹ Its many productive salmon streams, important fish and wildlife habitat, and beautiful scenery are the foundation for Southeast Alaska's local economy. Sport, commercial and subsistence fishing in Southeast Alaska contributes \$1 billion annually to the regional economy and accounts for 10% of Southeast Alaska's employment.² In addition to this, more than 1.3 million out-of-state visitors flock to the Tongass each year, making tourism the largest source of private-sector jobs and earnings in southeast Alaska.³ Together, the visitor and seafood industries provide 26% of all regional employment.⁴ These industries have their foundation in healthy watersheds, in-tact fish and wildlife habitat, natural scenic beauty

1 U.S. Forest Service, Tongass Salmon Factsheet (Mar 2017) Attachment 1, available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd554592.pdf.

2 TCW Economics, Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska, prepared for Trout Unlimited Alaska 16 (July 2010) Attachment 2, available at <http://www.tu.org/sites/www.tu.org/files/documents/EconReportFull.pdf>. The number of jobs supported by salmon fishing and its economic contribution are likely to be even greater today than was indicated since these figures were calculated using data from 2007 and the economy and salmon prices have continued to increase in years since.

3 Rain Coast Data, Southeast Alaska by the Numbers 2019, prepared for Southeast Conference at 7 (Sep. 2019) Attachment 3, available at

<http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>.

4 Id. at 5.

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and untouched landscapes, and depend heavily on protections afforded to inventoried roadless areas by the 2001 Roadless Area Conservation Rule.

Fishing and tourism far outpace other private-sector sources of employment and earnings. They provide a steady and reliable source of employment and earnings for many Southeast Alaskan communities. While logging once played a historically important role in the economy of Southeast Alaska, current timber industry employment accounts for just 0.7% of regional jobs.⁵ Despite decreases in Southeast Alaska's timber industry, in the years after the 2001 Roadless Rule was initially promulgated Southeast Alaska's population increased 7 percent from 2000 to 2012 and personal income increased by 17 percent over the same period.⁶ Per capita income for Southeast Alaskans outpaces statewide and national averages while unemployment rates remain lower than statewide or national averages.⁷ Southeast Alaska's economy is buoyed by its healthy fish and wildlife habitat, productive salmon streams and scenic beauty. Managing the Tongass with fish, wildlife and visitor services at the forefront is the key to ensuring local communities and economies are strong and stable.

II. Roadless Area Protections are Essential to the Local Economy and a Successful Transition.

Two key developments in the Tongass over the past nearly two decades are responsible for the growth and strength of Southeast Alaska's fishing and tourism industries. First, the 2001 Roadless Rule was put in place to conserve the remaining wild landscapes and unroaded portions of the Tongass, which are the core of the local

fishing and tourism industries. While various unsuccessful litigation efforts have been mounted against the 2001 Roadless Rule on the Tongass, and a Tongass exemption was temporarily in place before the Ninth Circuit Court of Appeals ruled it to be unlawful, the 2001 Roadless Rule has successfully conserved inventoried roadless areas on the Tongass as the law of the land for the vast majority of the past 18 years. Because of the 2001 Roadless Rule, inventoried roadless areas remain unimpacted by industrial old-growth logging and unnecessary road construction, remain reliably productive as cornerstones of the region's fishing and tourism industries, and remain accessible for fishing, hunting, recreation, guiding, and tourism.

Second, through the collaborative efforts and hard compromise of the Tongass Advisory Committee (TAC) and the 2016 amendment to the Tongass Land Management Plan (TLMP), the Forest Service has a roadmap for aligning its management of the Tongass with the public interest and the economic realities of the region. Successfully implementing this collaborative vision would allow the Forest Service to align the Tongass with the public's needs, support a sustainable young-growth forest products industry, and protect the best remaining fish and wildlife habitat on the forest—including roadless areas, the Tongass 77, and TNC/Audubon Conservation Priority Areas.

5 Id.

6 USDA, Tongass Land and Resource Management Plan Final Environmental Impact Statement Plan Amendment, R10-MB-769e at 3-478 (June 2016) hereinafter 2016 TLMP FEIS.

7 Id. at 3-478 to 479.

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Timber planning, including the current proposal to repeal protections for roadless areas on the Tongass, too often comes at the expense of the region's strong economic base of fisheries and tourism. Once-productive salmon streams no longer support abundant salmon runs and ample wildlife populations when clearcut logging disrupts recruitment of large-woody debris, erosion overburdens nearby streambeds, roads cross streams and cut off salmon migration to important spawning or rearing habitat, or second-growth stands become so overgrown they fail to provide meaningful winter habitat for wildlife. Tourists and recreationists don't travel to the Tongass to see and hike through large swaths of clearcut lands. They come to take in its scenic beauty and in-tact landscapes. Each of these factors contributed to why the Forest Service adopted the original 2001 Roadless Rule and remain true today.⁸

The past 60 years of industrial logging on the Tongass has targeted the rarest and most productive stands of large-tree old-growth forest. High-grading has reducing the highest-volume contiguous old growth on the Tongass by 66 percent forest-wide.⁹ On northern Prince of Wales Island, where large-scale old-growth logging has been most intense, 94 percent of the contiguous large-tree old-growth stands have been logged since 1954.¹⁰ This contiguous large-tree old-growth forest, which historically covers less than five percent of the Tongass, is among the most valuable habitat for fish and wildlife. Past logging and road building has left a legacy on the Tongass where, according to Forest Service estimates, roughly 65 watersheds are in need of significant restoration with an estimated cost of more than \$100 million to address the backlog of unmet watershed restoration needs.¹¹ The backlog of road maintenance needs on Alaska's National Forests amounts to \$68 million, begging the question of why we would compound these problems through expanded road construction in new areas.¹² Approximately a third of all instances on the Tongass where roads intersect streams fail to meet applicable standards for salmon migration.¹³

III. The Propose Rule is out of Touch with the Needs of the Public.

The overwhelming weight of public input recognizes the extraordinary value of roadless areas on the Tongass and a desire to keep the 2001 Roadless Rule's important protections in

8 See Special Areas; Roadless Area Conservation, 66 Fed. Reg. 3244, 3245-47 (Jan. 12, 2001).

9 Albert, D. M., and J. W. Schoen, Use of Historic Logging Patterns to Identify Disproportionately Logged Ecosystems within Temperate Rainforests of Southeastern Alaska, 27 Conservation Biology 4 at 779-780 (2013) Attachment 4; Albert, D. M., and J. W. Schoen, A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. eds J. W. Schoen, and E. Dovichin. Audubon Alaska and The Nature Conservancy (2007), available at <https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

10 Id.

11 USDA, Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013, R10-MB-734 at 11 (Nov. 2011) Attachment 5, available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5339075.pdf.

12 U.S. Forest Service, Questions for Mr. Quigley at 1 (June 2018) Attachment 6.

13 U.S. Forest Service, 2016-2017 Tongass National Forest Monitoring and Evaluation Report at 3 Attachment 7.

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place. Numerous tribes and communities have passed resolutions or spoken out in favor of protecting roadless areas on the Tongass. Many affected businesses in the fishing, hunting and tourism industries also support protecting roadless areas.¹⁴ Public comment at the public meetings for the proposed exemption overwhelmingly favored retaining the 2001 Roadless Rule. In some communities, 100% of the public comment supports protecting roadless areas. Recent polling shows 79% of Alaskans and a comparable number of southeast Alaskans want to either keep the 2001 Roadless Rule as it is, or to make minor changes that are offset by increased conservation measures for important fish and wildlife.¹⁵ Similarly, the majority of public comments to the Forest Service during the scoping period opposed changing the 2001 Roadless Rule for Alaska.¹⁶ The scientific community also recognizes the importance of the 2001 Roadless Rule and the extraordinary value of the remaining big-tree old-growth, and has repeatedly called on the Forest Service to end its old-growth timber sale program.¹⁷

When evaluating the benefits from the Tongass to society, the Forest Service and the State of Alaska are placing far too much emphasis on traditional extractive resources while largely ignoring benefits from fish, wildlife, subsistence, recreation, water resources, and carbon storage. By far the most valuable activities occurring on the Tongass are derived from intact fish and wildlife habitat and wild scenery. This is true throughout the National Forest System, but is especially relevant in Southeast Alaska where the Tongass comprises such a large portion of the land base and where the forest's roadless qualities play such an integral role in southeast Alaska's businesses, economy and lifestyle. Maximizing the benefits from the Tongass to the public requires the Forest Service to manage the Tongass in a way that prioritizes the many contributions of fish, wildlife and visitor services—all of which primarily derive from inventoried roadless areas.

In addition to safeguarding important fish, wildlife, subsistence, and recreational resources throughout roadless areas in the Tongass, the 2001 Roadless Rule also provides reasonable accommodation to community development and infrastructure needs. The 2001 Roadless Rule provides access for mining, energy, and community infrastructure projects. It allows forest health, recreation, and cultural activities. The Kake-Petersburg Intertie and the Blue Lake Hydropower Project Expansion, which opponents of the 2001 Roadless Rule often cite as being obstructed by the rule, are explicitly allowed by court order along with a variety of

14 See Business Letter to Secretary Perdue and Chief Christiansen (Dec. 16, 2019) Attachment 8.

15 See Tulchin Research, Poll Findings: Alaska's Tongass National Forest at 7 (May 2019) Attachment 9, available at http://www.americansalmonforest.org/uploads/3/9/0/1/39018435/ak_tongass_trout_unlimited_final.pdf.

16 U.S. Forest Service, Alaska Roadless Rule Scoping Period: Written Public Comment Summary at 2 (Feb. 2019) available at https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4616651.pdf.

17 See Jack Ward Thomas and Mike Dombeck, Seattle Times Op Ed, Declare harvest of old-growth off-limits and move on (Aug 23, 2003); Letter to the President by 78 North American Scientists (lead signatories were Jack Ward Thomas and Mike Dombeck) calling for a national old growth policy to protect the remaining old growth on national forest lands throughout the US (June 25, 2014); Letter to Secretary Vilsack from 200+ North American Scientists urging a quick transition out of old-growth logging on the Tongass National Forest (October 15, 2014); Joint Society letter to Secretary Vilsack from American Fisheries Society (AK Chapter), American Ornithologist's Union, American Society of Mammalogists, Ecological Society of America, Pacific Seabird Group, Society for Conservation Biology, The Wildlife Society (January 20, 2015).

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other high-profile projects.¹⁸ As of June, 2019, all 58 applications submitted for projects in roadless areas in Alaska had been approved, most gaining approval within a month.¹⁹ The majority of these applications pertain to surface exploration of potential mining and hydropower projects, but they also include road realignment and reconstruction projects, an aerial tram, a geothermal project, personal use of timber, and a variety of other projects. In October, 2018, the process for approving these projects was further streamlined when Forest Service Chief Christiansen delegated authority to approve project requests to the Regional Foresters.²⁰

In many regards, Southeast Alaska has already transitioned. More than one-in-four jobs in Southeast Alaska are in either the fishing or tourism industries.²¹ Even when timber from private and state lands is included, the timber industry in Southeast Alaska accounts for just a few hundred jobs.²² While timber harvesting once played a historically important role in the economy of Southeast Alaska, the future of the Tongass timber program is in planning and implementing appropriately-scaled timber sales that support and encourage local manufacturing of young-growth forest products while also restoring managed stands in previously-harvested areas. If the Tongass is to truly support the local and regional economy, its management—and especially the management of its roadless areas—must place fishing and tourism industries at the forefront and to in every way possible avoid or minimize impacts to fish and wildlife habitat.

Exempting the Tongass, or even portions of inventoried roadless areas on the Tongass, from the protections afforded by the 2001 Roadless Rule will undercut the Tongass Transition, erode public confidence and trust in the Forest Service, serve as unnecessary obstacles to the creation of a sustainable forest products industry in the region, and undermine the economic lynchpins of Southeast Alaska's fishing and tourism economy. As the Forest Service itself notes, outfitters, guides and recreation-related businesses are the losers as a result of this

rulemaking, likely losing hundreds of thousands of dollars per year, if not more.²³

For at least a decade, from the Log Jam timber sale in 2009 to today's Central Tongass Project, the Forest Service has justified old-growth timber sales on the Tongass as "bridge timber" that are necessary to encourage the transition to young-growth forest products. A similar line of thinking permeated the TAC and the 2016 TLMP amendment, where industrial old-growth logging was justified to maintain the existing timber industry and capacity only until large volumes of young-growth timber becomes commercially viable and the arrival of the highly anticipated "wall of wood."

¹⁸ See U.S. District Court, District of Alaska, Judgement, *Organized Village of Kake v. USDA*, 1:09-cv-00023-JWS at 2-3 (May 24, 2011) Attachment 10.

¹⁹ U.S. Forest Service, *Frequently Asked Questions Regarding Inventoried Roadless Areas 6* (Jan. 2018) Attachment 11; U.S. Forest Service, *supra* note 12, at 1.

²⁰ U.S. Forest Service, *supra* note 12, at 1.

²¹ See *Rain Coast Data*, *supra* note 3, at 4.

²² See *id.* at 4.

²³ U.S. Forest Service, *Alaska Roadless Rulemaking Regulatory Impact Assessment and Cost-Benefit Assessment 32* (Oct. 2019) available at http://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4876769.pdf.

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Exempting the Tongass from the 2001 Roadless Rule disrupts the transition and greatly expands the suitable old-growth timber base, undoes years of progress built on public trust and collaboration, will have irreversible negative impacts to the remaining important fish and wildlife habitat on the forest, and set the transition and the Tongass back decades. Rather than creating large new exemptions to roadless area protections that encourage the timber industry to dig in its heels against the tides of change and to continue cutting as much valuable old-growth timber as possible, the Forest Service should conserve roadless areas on the Tongass and encourage investment in transition technologies and entrepreneurship within the Tongass timber industry.

IV. The Forest Service has Failed to Provide Adequate Opportunity for Public Input and Failed to Address Issues Raised in Scoping.

The Forest Service has needlessly rushed this rulemaking, has not provided adequate notice and opportunity for public input, and has not been responsive to the input it has received. Unlike the processes employed in development of the original 2001 Roadless Rule or the Colorado or Idaho state-specific rules, all of which allowed for diverse stakeholder input from the outset, the rulemaking for the Alaska Roadless Rule has been driven by special interests and the State of Alaska.

The Forest Service has improperly relied on the State of Alaska's Citizen Advisory Committee (CAC) as if it was a duly convened federal advisory committee, which it is not. The CAC was hastily convened without any of the procedural safeguards that apply to committees convened through the Federal Advisory Committee Act. Its membership failed to include anyone from the tourism or visitor services industry, failed to include anyone operating on the Tongass through a special use permit, failed to include anyone from the sport fishing or hunting

industries, failed to include anyone with scientific or technical expertise, and was heavily skewed toward resource extractive industries such as logging.²⁴ Many of its members had limited understanding of the Roadless Rule and did not have the resources to make an informed decision, such as information on existing commercial operators on the forest. As such, it had only a narrow view of the issues at stake and a relatively poor understanding of how the Roadless Rule functioned on the Tongass.

Despite these shortcomings, the Forest Service is treating the CAC as if it was a federal advisory committee. Each of the alternatives closely mirror the options forwarded to it by the CAC, even where those options conflict with input from the public, other cooperating agencies, or from the TAC's recommendations during the 2016 TLMP amendment. In addition, as has been widely reported, it's clear Alaska Governor Dunleavy convinced President Trump to direct

²⁴ See Alaska Roadless Rule Citizens Advisory Committee, Final Report to the Governor and State Forester, State of Alaska at 15 (Nov. 2018) available at https://s31207.pcdn.co/wp-content/uploads/sites/6/2019/11/Alaska-Roadless-Rule-Citizen-Advisory-Committee-Final-Report_11.21.2018.pdf.

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the Forest Service to undertake a full exemption even before the DEIS was made public.²⁵ This is predecisional. The Forest Service has allowed the State of Alaska to unduly influence this process while ignoring the overwhelming public comment in support of protecting roadless areas on the Tongass.

V. The Proposed Rule will not be "durable" and fails to Satisfy the Purpose and Need of the Rulemaking.

The purpose and need for this rulemaking is to achieve "a long-term, durable approach to roadless area management . . . that accommodates the unique biological, social and economic situation in and around the Tongass."²⁶ In order to satisfy this purpose and need, any new rule, if one is promulgated, must have broad support from diverse stakeholders throughout the region, including conservation interests and the fishing and tourism industries, while also being responsive to criticisms of the 2001 Roadless Rule, whether real or perceived. Unfortunately, the Forest Service has taken little effort to address criticisms of the 2001 Roadless Rule that are merely of perception and that could be remedied through efforts short of a new rulemaking and has proposed the most extreme option available. The Forest Service is advancing a proposed rule that is the product of undue political pressure from special interests instead of collaboration and compromise.

When the Forest Service first announced it was considering changes to the 2001 Roadless Rule in Alaska, TU was among a group of businesses and organizations that reached out to the Forest Service and State of Alaska expressing interest in finding a compromise that retained the core conservation principles of the Roadless Rule while alleviating concerns of its critics. At its core, while we support the 2001 Roadless Rule and do not believe an Alaska-specific rule is necessary, our suggestion was to develop a rule that: (1) provided a limited exemption for the "roadless roadless"; (2) expanded roadless area protections to those portions of the Tongass 77 and TNC/Audubon Conservation Priority Areas that are outside inventoried roadless areas; and (3) clarified that roads and tree harvest are allowed where reasonably necessary for essential infrastructure projects, energy generation projects, mining, and transportation projects.

Had the Forest Service developed and advanced an alternative based on input through a robust public process like that used for the Idaho or Colorado rules, it could have arrived at a durable solution. Unfortunately, the Forest Service has instead bent to the will of the State of Alaska and the old-growth logging industry, which are unwilling to accept anything less than a full repeal of the 2001 Roadless Rule on the Tongass. Conflict and controversy are mounting as a result and, if the proposed rule becomes final, litigation is sure to follow. Rather than

25 See The Washington Post, Trump Pushes to Allow new Logging in Alaska's Tongass National Forest (Aug. 27, 2019) Attachment 12, available at https://www.washingtonpost.com/climate-environment/trump-pushes-to-allow-new-logging-in-alaskas-tongass-national-forest/2019/08/27/b4ca78d6-c832-11e9-be05-f76ac4ec618c_story.html.

26 U.S. Forest Service, Draft Environmental Impact Statement Rulemaking for Alaska Roadless Areas at ES-2 (Oct. 2019) hereinafter DEIS.

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achieving a durable and lasting result that puts conflict behind us, this proposed rule douses the remaining embers of the timber wars with fuel.

VI. The Tongass 77 and TNC/Audubon Conservation Priority Areas are Important for Fish and Wildlife and Should be Conserved.

Various areas have been identified as especially important for fish and wildlife and deserve continued protection under any future Alaska-specific roadless rule. These areas include the Tongass 77 (commonly referred to as the T77) and areas identified by the Audubon/TNC Eco-regional Conservation Assessment as either Conservation Priority or Core Integrated Management Watersheds (commonly referred to as TNC/Audubon Conservation Priority Areas). These areas, along with roadless areas, were specifically recognized by the TAC, which recommended they be off-limits to future old-growth logging.²⁷ The 2016 TLMP amendment sought to implement the TAC's recommendations by identifying these areas as NOT suitable for old-growth logging.²⁸

Any Alaska-specific roadless rule should reinforce the TAC recommendations and the 2016 TLMP amendment by protecting the entire Tongass 77 and all TNC/Audubon Conservation Priority Areas, including those that are outside inventoried roadless areas. These protections should be as robust and as flexible as protections afforded inventoried roadless areas by the 2001 Roadless Rule while still allowing recreation, outfitters and guides, cultural and subsistence activities, and projects designed to restore forest health. If the Forest Service finalizes an Alaska-specific Roadless Rule, TU encourages extending the Watershed Priority to Tongass 77 and TNC/Audubon Conservation Priority Areas outside the existing roadless inventory, as is proposed as a component of Alternative 3.

The Tongass 77 are the "best of the best" from the thousands of salmon and trout watersheds on the Tongass. These areas were identified through a comprehensive process where researchers from the Alaska offices of the Audubon Society, The Nature Conservancy and Trout Unlimited, in consultation with federal and state biologists and various community and business stakeholder groups, identified the most important salmon-producing watersheds that lacked watershed-scale protections. Now narrowed down to 73 watersheds comprising

²⁷ Tongass Advisory Committee, Tongass Advisory Committee Final Recommendations at 13 (Dec. 2015) Attachment 13, available at http://www.merid.org/~-/media/Files/Projects/tongass/December%202015%20Meeting/Tongass%20Advisory%20Committee%20Final%20Recommendations_Dec%202015.pdf. While some former members of the TAC appear to now characterize the TAC's final recommendations as not unanimous or as not supporting the conclusion that the Tongass 77 should be off limits to old-growth logging, those comments contradict the well-established record of the TAC and the 2016 TLMP amendment. As the TAC's final recommendations clearly state, "The TAC agrees that the USFS should: . . . Limit the old growth timber base to the current definition of Phase I lands outside of The Nature Conservancy (TNC)/Audubon conservation priority areas, Tongass 77 (T77) watersheds and

Inventoried Roadless Areas." Id. While the TAC was instructed by the USDA and Forest Service to limit its recommendations to what was possible within the 2001 Roadless Rule, no similar direction was provided to the TAC for the Tongass 77 or TNC/Audubon Conservation Priority Areas, which were taken up by the TAC on its own accord.

28 USDA, Tongass National Forest Land and Resource Management Plan, R10-MB-769g at A-5 (June 2016) available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd527907.pdf.

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not quite 1.9 million acres,²⁹ the Tongass 77 form the backbone of Southeast Alaska's salmon fishery and the play a vital role on Southeast Alaska's local economy. The Tongass 77 enjoys support from more than 300 businesses and organizations, most of which are based in Southeast Alaska.³⁰ 7,233 individuals, 3,636 of which resided in Southeast Alaska, voiced support for protecting the Tongass 77 and making these areas off limits to logging during planning for the 2016 TLMP amendment.³¹

Like the Tongass 77, TNC/Audubon Conservation Priority Areas are hugely important to local fish and wildlife populations. These areas were identified through a thorough peer-review process conducted by scientists from Audubon Alaska and The Nature Conservancy.³² These areas are the most ecologically valuable areas for a diverse array of plant and animal species and their conservation is essential to the ecological health and function of Southeast Alaska.

Fish and wildlife, and Southeast Alaska's broad expanses of untracked land and scenic beauty, are the underpinnings of our local economy, culture, and community. Salmon and trout—and the communities, cultures and economies they sustain—require clean, healthy watersheds for spawning, rearing and migrating. Based on the outstanding fish and wildlife habitat values in the Tongass 77 and TNC/Audubon Conservation Priority Areas, and their incredible importance to local communities and the region's economy, these areas deserve special protection from future development in any new Alaska-specific rule developed by the Forest Service.

VII. The DEIS Fails to Take a Hard Look at Impacts to Fish and their Habitat.

The National Environmental Policy Act (NEPA) requires the Forest Service to take a hard look at the potential direct, indirect and cumulative effects of the proposed rule.³³ This must include effects and impacts that are "ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative."³⁴ Yet, the DEIS consistently underplays the potential impacts, makes numerous conclusions that are unsupported by the best available science, and fails to incorporate numerous relevant scientific studies. Because of these shortcomings, the DEIS is inadequate for an informed impacts analysis.

29 See Trout Unlimited, *The Tongass 77, Protecting Southeast Alaska's Best Salmon Watersheds* (Mar. 2, 2016) Attachment 14, available at http://www.americansalmonforest.org/uploads/3/9/0/1/39018435/t77_4-pager_summary_-_20160302.pdf.

30 See List of Tongass 77 supporters, available at <http://www.americansalmonforest.org/t77-supporters.html>.

31 Id.

32 See Albert, D. M., and J. W. Schoen, *A conservation assessment for the coastal forests and mountains*

ecoregion of southeastern Alaska and the Tongass National Forest In A Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. eds J. W. Schoen, and E. Dovichin. Audubon Alaska and The Nature Conservancy (2007), available at <https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>.

33 See 40 C.F.R. [sect] 1502.16.

34 Id. at [sect] 1508.8.

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The DEIS fails to adequately assess the current status of fishes and fish habitat on the Tongass, to discuss how the current status relates to historic abundance, and to analyze how the proposed action will affect fisheries, fish habitat, and the important waters that support these resources. Underlying the DEIS, and made explicit by various statements of Forest Service officials at public meetings, is the misguided belief that expanding logging and logging roads into roadless areas will have no effect on fish and fish habitat. This assertion is conclusory and unsupported by the scientific record and common sense.

First, the Forest Service seems to take the position that, while the proposed rule will give it more flexibility to plan logging in new places, the exemption will not lead to more logging. The State's petition and the various comments by Alaska's elected officials and industry proponents make clear that the motivation for the exemption is to revitalize and expand the failing old-growth logging industry. The old-growth logging industry has already high graded the economically viable timber stands. Forest wide, 66.5% of the Tongass' contiguous high-volume stands have been logged. On northern Prince of Wales Island, where logging has been most intense, 93.8% of the contiguous high-volume stands have been logged.³⁵ The old-growth logging industry has already cut nearly all the economically viable forest it has access to on the Tongass and must expand into new roadless areas if it is to continue.

Second, the Forest Service maintains TLMP provides a second layer of protection by identifying most roadless areas as "not suitable" for logging. However, as part of this rulemaking the Forest Service also proposes making an administrative change to the forest plan to reclassify 185,000 acres as suitable for logging. 165,000 of those acres are old-growth forest and 20,000 of those acres are young-growth forest, all of which will newly be available for logging if this proposed rule becomes final. Additionally, the Forest Service often amends the Forest Plan on a project-by-project basis to make new areas suitable, which it likely would do in the future to make new lands available for logging beyond the initial 185,000 acres.

Third, the Forest Service suggests that standards and guides in TLMP, such as stream buffers that prohibit logging within 100 feet of a salmon stream, adequately protect salmon even where logging is allowed. However, as we've seen in the Tongass and elsewhere, logging and logging roads lead to sedimentation, higher stream temperatures, lack of large woody debris recruitment, migration barriers, and a variety of other impacts that degrade habitat and reduce salmon productivity. Additionally, standards and guidelines on the Tongass lag behind what the Forest Service requires on other salmon-producing national forests, including those managed under the Northwest Forest Plan where the Forest Service requires 300-foot buffers.

Fourth, although the DEIS seems to acknowledge that roads are the largest source of sediment to salmon streams,³⁶ and a recent monitoring and evaluation report identified a third

35 See Albert and Schoen, *supra* note 9, at 779-780.

36 DEIS at 3-112.

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of all bridges and culverts across salmon streams on the Tongass fail to meet applicable fish passage standards,³⁷ the DEIS fails to assess the impacts associated with additional road construction necessary to support logging activities in new portions of the Tongass. As the DEIS notes, "road-crossing structures have been common partial or complete barriers to fish movement in much of the developed areas where fish are present,"³⁸ "roads pose the greatest risk to fish resources on the Tongass,"³⁹ and "Roads have been found to contribute more sediment to streams than any other land management activity."⁴⁰ Even if the rate of logging stays within the projections contemplated by the 2016 TLMP amendment, for which there is no guarantee, road construction must increase under the proposed rule in order to facilitate logging in areas currently inventoried as roadless. Yet, the DEIS erroneously states that "new road construction would be similar under all alternatives"⁴¹ and that the proposed rule will have "Neutral/No Effect" on fisheries.⁴²

This proposed rule will allow industrial clear-cut logging of old growth forest to expand into new areas. This expansion will require more road construction and reconstruction. Additionally, the rate and footprint of logging operations is likely to increase through subsequent plan amendments and due to new economically viable timber becoming available. These expansion areas will be the best remaining economically viable stands of old-growth forest, which are also the most important places for salmon and other fish and wildlife species. Logging and road building in these expanded areas will impact salmon, resident fishes, nearby wildlife, and their habitat. The Forest Service ignores these realities and fails to take a hard look at these impacts. The DEIS does not satisfy the requirements of NEPA and must be revised.

VIII. The DEIS Fails to Take a Hard Look at Impacts to Tourism and Recreation.

The DEIS and supporting materials fail to account for existing tourism and recreation activities on the Tongass, fail to account for future growth in those activities, and as a consequence fail to take a hard look at reasonably foreseeable impacts to tourism and recreation. The DEIS lists the small cruise vessel capacity and notes that 242 permitted outfitters and guides operated on the Tongass between 2013 and 2017,⁴³ but somehow concludes the proposed rule will have minimal to no effect on those activities.⁴⁴ Additionally, the DEIS dismisses likely impacts to "other popular recreation and tourism activities, such as saltwater fishing, sea kayaking, and shopping" because they "do not take place on the Tongass" and the forest merely provides "a backdrop for these activities."⁴⁵ This assertion is unsupported.

³⁷ U.S. Forest Service, *supra* note 13, at 3.

³⁸ DEIS at 3-110.

³⁹ *Id.* at 3-112.

⁴⁰ *Id.*

⁴¹ *Id.* at 3-113.

⁴² *Id.* at 2-25.

⁴³ *Id.* at 3-39.

44 Id. at 2-25.

45 Id. at 3-41.

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The proposed rule would expand logging and logging roads into new part of the Tongass that are currently undeveloped. Many of these roadless areas are the foundation for local outfitter and guide businesses, tour companies, and are popular with recreationists. Outside of general observations about the volume of use on the Tongass, the Forest Service provides no meaningful accounting of existing or foreseeable future use, where that use occurs on the forest, and makes no meaningful assessment of how that use will be impacted or displaced by expanded logging activities and new logging roads. The Forest Service must undertake a meaningful assessment of how expanding logging activities into new parts of the forest will impact and displace existing forest users. The Forest Service must also consider how this expanded logging will curb growth in the tourism and recreation sector. A new revised or supplemental DEIS is necessary to address these shortcomings.

IX. Additional Specific Comments on the Proposed Rule and Action Alternatives.

TU supports Alternative 1 and encourages the Forest Service to take "no action." However, the following comments are provided on the various action alternatives.

a. "Logical Extensions" Should Avoid the Tongass 77 and TNC/Audubon Priority Areas.

Alternative 3 exempts "substantially-altered roadless areas" and modifies roadless boundaries to allow logging up to the "logical end points of existing road and timber harvest units" in areas currently inventoried as roadless.⁴⁶ These logical extensions are sprinkled throughout the forest. While TU opposes exempting any of the logical extensions, many of them are especially problematic because they are located in high-value areas for fish, wildlife and/or recreation. The below chart outlines the most problematic logical extensions. These logical extensions should not be included in Alternative 3 or, at a minimum, reduced in size to eliminate the conflict.

1. Timber Harvest and Roads Should not be Allowed for Experimental Forests in Roadless Areas.

Alternatives 2 through 5 would allow timber harvest and road construction or reconstruction in designated experimental forests for research or administration.⁴⁷ However, this allowance is inconsistent with the protection of roadless values and should not be included in the final rule. Any research or administrative activities that rely on timber harvest or road construction and reconstruction should occur outside inventoried roadless areas.

1. Timber Harvest and Roads Should not be Allowed for Fishways, Hatcheries or Aquaculture Facilities.

Alternatives 2 through 5 would allow road construction or reconstruction in conjunction with fishways, hatcheries or aquaculture facilities in roadless areas and/or community priority areas.⁴⁸ However, this allowance is inconsistent with the conservation of roadless values and should not be included in the final rule. Unless the road construction or reconstruction is

47 Id. at 2-7.

48 Id. at 2-7 and 2-8.

necessary pursuant to a pre-existing right, any hatcheries or aquaculture facilities should be sited to avoid road construction or reconstruction in roadless areas.

1. Commercial Timber Harvest and Logging Roads Should be Prohibited in Community Priority Areas.

Alternative 3 would allow commercial timber sales and associated logging roads in community priority areas where the volume is less than 1 million board feet (mmbf) of timber.⁴⁹ This leaves the door open for a series of commercial timber sales of unlimited volume and unlimited new road construction so long as each individual sale is less than 1 mmbf. In effect, this invites segmentation, undermines the purpose of community priority areas, and fails to conserve the important roadless values. This language should not be included in the final rule. Commercial timber sales and logging roads should be prohibited in community priority areas.

1. Timber Harvest Associated with Biomass Production Should be Prohibited in Community Priority Areas.

Alternative 3 would allow timber harvest where "needed for the construction, expansion, utilization or maintenance of . . . biomass heating and energy systems" and "other renewable energy projects" in Community Priority Areas.⁵⁰ If adopted as part of the final rule, this language should be changed to clarify that timber harvest is allowed only when incidental to construction of the generation facility and prohibited if done in order to provide a supply of biomass fuel. Timber harvest to fuel a biomass facility must comply with any and all restrictions applicable to traditional commercial logging activities.

1. Timber Harvest Associated with Alaska Native Customary and Traditional Uses Should be Allowed.

TU supports allowing timber harvest for Alaska Native customary and traditional uses, such as for the harvest of individual trees for totems, in roadless areas when consistent with maintaining and conserving roadless characteristics. Associated road construction and reconstruction should be prohibited.

1. Timber Priority Alaska Roadless Areas Should not be Allowed.

Alternative 4 would allow timber harvest and road construction or reconstruction in timber priority roadless areas.⁵¹ Establishing Timber Priority Alaska Roadless Areas is inconsistent with the conservation or roadless values and should not be allowed. This roadless

⁴⁹ Id. at 2-8.

⁵⁰ Id.

⁵¹ Id.

classification should not be part of the final rule. Commercial logging and logging roads should be allowed only outside inventoried roadless areas.

1. Administrative Changes to TLMP.

Alternatives 2 through 6 propose administrative changes to the 2016 TLMP amendment to change 185,000 acres of the Tongass from not suitable for timber production to suitable.⁵² These changes are inappropriate for this rulemaking. The purpose and need does not contemplate changes to TLMP, this was not an issue significantly raised during scoping, and is not an issue that has been adequately noticed during the public comment period for the DEIS.

The 2016 TLMP amendment was the product of years of collaboration and compromise among diverse stakeholders that struck a careful balance among conservation and resource extraction interests. Unlike the ongoing roadless rulemaking, which relies on input from a non[shy]representative stakeholder group convened by the State of Alaska, the 2016 TLMP amendment is based on recommendations from the TAC, a duly convened federal advisory committee that complied with all procedural and substantive requirements of the federal advisory committee act.⁵³ At its core, the TAC recommended phasing out large-scale old-growth logging over a 16-year period, easing standards and guides to allow increased access to young-growth timber as a way of encouraging the transition away from old-growth logging, and protecting important areas from future logging, including roadless areas, the Tongass 77, and TNC/Audubon Conservation Priority Areas.⁵⁴ The TAC was clear that its recommendations must be taken as a whole and not adopted partially or in a piecemeal manner.

Changing the suitability determination in the 2016 TLMP amendment undermines the robust and collaborative process that was employed in achieving its careful compromise. This is especially true where, as here, the Forest Service proposes changes to the forest plan without undertaking a similarly robust or collaborative process. If the Forest Service desires to undertake changes to the forest plan, it must do so separately from proposed changes to the 2001 Roadless Rule, with proper public notice that such changes are being contemplated, and with a robust process on par with the process used with the TAC.

1. The Final Rule Should not Include Language Affecting the Chugach National Forest.

There is no reason for the Forest Service to include the Chugach National Forest in its final rule and all language affecting the Chugach should be removed. The State of Alaska's petition was clear that it requested action regarding the Tongass.⁵⁵ It did not request action

⁵² Id. at 2-2.

⁵³ Tongass Advisory Committee, *supra* note 27, at 13.

⁵⁴ Id.

⁵⁵ Mack, Andrew T, Commissioner Alaska Department of Natural Resources, State of Alaska Petition for USDA Rulemaking to Exempt the Tongass National Forest from Application of the Roadless Rule and other Actions (Jan 2018).

affecting the Chugach.⁵⁶ Similarly, although the Forest Service has often referred to the rulemaking as for an "Alaska Roadless Rule," the Forest Service has given every indication it was limiting its consideration to the Tongass and not considering changes affecting the Chugach. Upon releasing the DEIS, the Forest Service press release repeatedly mentions the Tongass and states "The Chugach National Forest would remain under the 2001 Roadless Rule."⁵⁷

Despite the Petition's clear limitation to the Tongass, and public statements by the Forest Service that proposed changes were limited to the Tongass, the Forest Service has nonetheless proposed changes that significantly

undermine roadless area protections on the Chugach. These changes are two-fold:

First, the Forest Service proposes creating a mechanism to allow "administrative corrections" to roadless boundaries in the Chugach following public notice and 30-day comment period.⁵⁸ These changes are unnecessary because the 2001 Roadless Rule clearly contemplates corrections when it defines "Inventoried roadless areas" as "Areas identified in a set of inventoried roadless areas maps, . . . or any subsequent update or revision of those maps."⁵⁹ Instead of creating a new regulation for the Chugach and extending the Alaska roadless rulemaking beyond its scope, the Forest Service should work within the existing 2001 Roadless Rule to address any administrative corrections that might be appropriate for the Chugach.

Second, the Forest Service proposes creating a mechanism to modify the classification and boundaries of roadless areas on the Chugach after public notice and a 45-day comment period.⁶⁰ This second provision would create a loophole in roadless conservation so great as to render roadless area protections in the Chugach meaningless. Any future project, even a massive timber sale, could be allowed in roadless areas on the Chugach through a simple reclassification or boundary modification. Except for the requirement for a simple notice and comment period, such as is required for any large project anyway, there is no limit to what can be allowed in roadless areas of the Chugach and no standard for when the reclassification or boundary modification is appropriate. Even if the Forest Service decides to retain the first subpart of the Chugach section, this second provision must be excluded.

Modifying the 2001 Roadless Rule for the Chugach is unnecessary, is inconsistent with the conservation of roadless areas, and is especially inappropriate here since the Forest Service has repeatedly assured the public there will be no changes to the Chugach. If the Forest Service desires to modify how roadless areas on the Chugach are managed, it must initiate a new rulemaking with proper notice and scope to include the Chugach.

⁵⁶ See *id.*

⁵⁷ U.S. Forest Service, USDA Forest Service Seeks Public Comment on Draft Environmental Impact Statement, Alternatives to a Proposed Alaska Roadless Rule at 2 (Oct. 15, 2019) available at https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4876053.pdf.

⁵⁸ See 84 Fed. Reg. 55528-29 (Oct. 17, 2019).

⁵⁹ 36 C.F.R. [sect] 294.11 (emphasis added).

⁶⁰ See 84 Fed. Reg. 55529 (Oct. 17, 2019).

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X. Conclusion.

The proposed Alaska Roadless Rule, which would fully exempt the Tongass and create misguided loopholes for the Chugach, is a huge leap backward and risks undoing much of the progress gained through compromise and collaboration in recent years. It turns its back to Southeast Alaska's economic strengths[mdash]fishing, tourism and outdoor recreation[mdash]which now account for 26% of regional employment and \$2 billion to the local economy. It also short changes the values that make the Tongass so unique and valuable to local residents and visitors alike.

Roadless areas on the Tongass are some of the best and most valuable lands on the forest. Many of the most

important salmon streams are in roadless areas. Increasingly scarce winter deer range and prime bear habitat is often found in low elevation roadless areas. Roadless areas offer the right combination of beautiful scenery, wild landscapes, fish and wildlife, and access that local residents and the growing tourism and recreation industry demands. The Tongass is a paradise[mdash]not just for Alaskans, but for all Americans. The Forest Service should abandon its proposed exemption and, instead, continue long-standing protections for roadless areas.

Thank you for the opportunity to provide input into this planning process. Please do not hesitate to contact me by email at awilliams@tu.org or by phone at 907.227.1590 if you have any questions.

Sincerely,

Austin Williams

December 16, 2019

The Honorable Sonny Perdue Ms. Vicki Christiansen

U.S. Department of Agriculture U.S. Forest Service

1400 Independence Ave., S.W. 1400 Independence Ave., S.W.

Washington, D.C. 20250 Washington, D.C. 20250

Dear Secretary Perdue and Ms. Christiansen,

We are outfitters and guides, tour operators, gear manufacturers and retailers, sportsmen organizations, and conservation groups that value and depend on the Tongass National Forest. We employ hundreds of southeast Alaskans, have tens-of-thousands of Alaskan supporters, and cater to customers that travel to the Tongass for its world-class fish and wildlife, recreation values, subsistence resources, and for the economic opportunities roadless areas provide. The proposed Alaska Roadless Rule and decisions about how to manage the Tongass have a direct and profound impact on us, our customers, and our members.

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The proposed Alaska Roadless Rule, which would fully exempt the Tongass, is a huge leap backward and risks undoing much of the progress gained through hard compromise and collaboration in recent years. It turns its back to the region's economic strengths, fishing, tourism and outdoor recreation, which now account for 26% of regional employment and \$2 billion to the local economy, and short changes the values that make the Tongass so unique and valuable to local residents and visitors alike. Exempting the Tongass from the Roadless Rule unnecessarily courts conflict and empowers the most extreme voices while obstructing more productive and mutually beneficial pathways to the future. The Forest Service should abandon its proposed exemption and, instead, maintain protections for roadless areas within the Tongass.

Many of us work directly with the Forest Service, either through special use permits to operate on the Tongass, as project partners, or as visitors, hunters, anglers, and subsistence users. Our ability to fulfill our missions and meet the needs of our customers, and the Forest Service's ability to meet the needs of the public, are directly tied to one another. Either we succeed as stewards of our public lands together with the Forest Service, or we

standby as turmoil over management decisions grows and forest values are degraded.

Many of the undersigned parties have long supported efforts by the Forest Service to transition the Tongass from unsustainable old-growth logging to management focused on fish and wildlife, tourism and recreation, and a sustainable young-growth forest products industry. We cheered the original transition announcement in 2010, worked tirelessly in support of the 2016 amendment to the Tongass Land Management Plan, and have supported its implementation since. Although compromise can be difficult, the need to move beyond the persistent conflict that has clouded the Tongass for decades is paramount.

Roadless areas on the Tongass are some of the best and most valuable lands on the forest. Many of the most important salmon streams are in roadless areas. Increasingly scarce winter deer range and prime bear habitat is often found in low elevation roadless areas. Roadless areas offer the right combination of beautiful scenery, wild landscapes, fish and wildlife, and access that our growing tourism and recreation industry demands. The Roadless Rule's protections for these unique values give our businesses and organizations a level of certainty upon which we base our business investments and hiring decisions.

The Tongass is a paradise[mdash]not just for Alaskans, but for all Americans. Roadless areas in the Tongass contain much of the region's most productive wildlife habitat, quality salmon habitat and clean water, and recreation opportunity. Any durable and long-lasting solution to the persistent land-management challenges on the Tongass must be based on collaboration and care for the important fish, wildlife, recreation, subsistence and scenic values that make the Tongass unique among our public lands. The proposed Alaska Roadless Rule fails on this measure. We encourage the Forest Service to listen to the overwhelming weight of public comment, the needs of businesses and organizations like ours, and to not exempt the Tongass from the Roadless Rule.

Sincerely,

Above and Beyond Alaska Hatch Outdoors Inc

Becky Janes, Owner Andrew Dickinson, General Manager

Juneau, AK Vista, CA

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[Attachment contains Tongass Salmon Factsheet]

[Attachment contains the technical report, [ldquo]Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska[rdquo]]

[Attachment contains the fact sheets, [ldquo]Southeast Alaska By the Numbers 2019[rdquo]]

[Attachment contains Journal Article titled "Use of Historical Logging Patterns to Identify Disproportionately Logged Ecosystems within Temperate Rainforests of Southeastern Alaska[rdquo]]

[Attachment contains USDA Investment Strategy in Support of Rural Communities in Southeast Alaska 2011-2013]

[Attachment contains Q&A between Mr. Quigley and USFS]

[Attachment contains 2016-2017 Tongass National Forest Monitoring and Evaluation Report]

[Attachment contains PowerPoint presentation titled "Poll Findings: Alaska Tongass Forest"]

[Attachment contains Case 1:09-cv-00023-JWS Document 85 Filed 05/24/11 Organized Village of Kake, et al. vs. US Department of Agriculture, et al. and State of Alaska and Alaska Forest Association]

[Attachment contains USDA article titled "Frequently Asked Questions Regarding Inventoried Roadless Areas"]

[Attachment contains Washington Post Article titled "[dquo]Trump Pushes to Allow New Logging in Alaska[rsquo]s Tongass National Forest[rdquo]]

[Attachment contains 2015 document titled "Tongass Advisory Committee Final Recommendations"]

[Attachment contains article titled "The Tongass 77 Protecting Southeast Alaska's Best Salmon Watersheds"]

[Position]