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Title:
Comments: Comments on Draft EIS, Alternatives to a Proposed Alaska Roadless Rule

USDA Forest Service, Please see the attached comments from the Alaska Shorebird Group and Boreal Partners in Flight, Cheers, Rebecca

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December 16, 2019

Secretary Sonny Perdue
Department of Agriculture
Attn: Alaska Roadless Rule

USDA Forest Service
P.O. Box 21628

Juneau, Alaska 99802

Re: Boreal Partners in Flight and Alaska Shorebird Group Comments on the Draft Environmental Impact Statement for Alternatives to a Proposed Alaska Roadless Rule

Dear Secretary Perdue,

This letter represents the Boreal Partners in Flight and Alaska Shorebird Group public comments on the Draft Environmental Impact Statement (DEIS) for Alternatives to a Proposed Alaska Roadless Rule.

Boreal Partners in Flight (BPIF) is a coalition of scientists, conservationists, and birders who are working together to help conserve landbird populations throughout boreal regions of North America. It is a regional working group of the international Partners in Flight (PIF) program and includes members from northwestern Canada and Alaska. BPIF was founded in 1992 because of concerns about continental declines in populations of many landbird species and now promotes conservation, raises awareness, and fosters research on landbirds and other species that use terrestrial habitats, such as shorebirds, owls and grouse. BPIF also includes the Alaska Raptor Group as a subgroup, which ensures that raptors are also represented within the region. The Alaska Shorebird Group (ASG) was formed in 1997 and includes academic and private researchers, federal and state agency staff, conservation organizations, and shorebird enthusiasts. The goal of the group is to raise awareness about shorebirds in Alaska, develop conservation actions, and exchange information on issues and research findings for Alaska's shorebirds. We are representing the interests of these groups.

There is an intrinsic ecological value of roadless areas and old-growth forests, to fish and wildlife habitats, as well as to the people who live in and visit the Tongass. There is also an economic value to intact ecosystems. The continued and unsustainable high-grading of the rarest but most ecologically valuable old-growth stands on the Tongass is threatening these values (Albert and Schoen 2013). Our comments focus primarily on the DEIS preferred alternative and

highlight the insufficient analysis of potential impacts under the various alternatives in the DEIS. Additionally, we list specific concerns that the DEIS does not adequately address.

We strongly recommend Alternative 1 (the No Action Alternative) be selected in the final EIS and Record of Decision. Continuing the current roadless rule would best maintain the ecological integrity of the Tongass National Forest and provide the most protection for forest-dependent bird species and their related socioeconomic values. Of the other alternatives, we hope the USFS considers 2, 3, and 4, which provide some protections for key watersheds over the Alternatives 5 and 6 which would repeal or significantly diminish roadless protections.

After reviewing the proposed modifications, we have some specific concerns that we describe below.

! There is insufficient analysis of how this will impact bird populations.

There is no analysis of the effects on productivity or population trends, for most species, including many for which PIF and others have documented serious conservation concerns (BPIF 1999, Rosenburg et al. 2016, Audubon Alaska 2017, Alaska Shorebird Group 2019). For example, in the DEIS all migratory bird species are predicted to benefit from the transition to young-growth harvest continued under all alternatives due to the reduced long-term scheduling of productive old growth harvest. This is inaccurate in that it does not recognize that bird species use widely different habitats. Not all bird species will benefit from an increase in young-growth forest, nor from a transition to young-growth harvest.

The analysis should take into consideration important and distinct Tongass species requirements, including some species migrate along the coast, others are mainland riparian and avalanche chute breeders, and some are dependent on high-volume old-growth forest. For example, shorebirds use the Stikine River Delta and other intertidal and estuarine areas as stopover sites during north and southward migrations, and changes in forest management could increase disturbance levels along the coast and possibly siltation rates at the months of streams if sufficient buffers are not provided. Both factors could negatively affect shorebirds

There has been no adequate in-depth analysis of the impacts of Tongass forest harvest on bird populations since the 1997 Tongass Land Management Plan, over 20 years ago (USDA 1997). The DEIS should provide species-specific analyses of the impacts of this and future management projects on species of concern, including Audubon Alaska WatchList Species, USFS Management Indicator Species, and Audubon's Common Birds in Steep Decline (BPIF 1999 (and new revision expected 2020), Rosenburg et al. 2016, Audubon Alaska 2017).

Furthermore, the cumulative effects analysis for birds is insufficient. While there is a list of past, present, and reasonably foreseeable projects considered, there is little actual analysis regarding cumulative impacts to birds. Exceptions include some analysis for the Prince of Wales Spruce Grouse and general old-growth biological diversity.

The cumulative effects analysis should also consider socio-economics, including the benefits of birding and wildlife tourism (see the section on ecotourism below). For example, potential interactions between Recreation/Tourism and Timber are not considered (DEIS, Table B-2).

Finally, the DEIS implies that this proposed rule will increase flexibility in designing timber sales. We are concerned additional timber harvest in roadless areas would likely occur in the foreseeable future, yet there has been no meaningful analysis of the impacts of this future timber harvest to birds or other taxa. Such an analysis should be included in this EIS under cumulative effects.

! Audubon WatchList bird species may be impacted by roads and associated logging.

The Prince of Wales Spruce Grouse is an endemic species only found on Prince of Wales Island and adjacent islands. Island endemics are particularly vulnerable to extinction due to their small population sizes and relative isolation. Prince of Wales Spruce Grouse has been shown to prefer unharvested forest at the watershed scale and to avoid edges. This species may use roads as corridors between habitats and as a source of grit, yet road-related factors were the largest source of mortality on Prince of Wales Island (Nelson 2010). Prince of Wales Spruce Grouse and mainland subspecies exhibit sufficiently different survival rates and habitat preference, which warrants specific management (Nelson 2010). The negative effects of roads on this vulnerable population has not been adequately analyzed in the EIS.

The Northern Goshawk, a Tongass National Forest Sensitive Species, is likely to be adversely affected if a Roadless Rule repeal leads to increased harvest and forest landscape fragmentation. The Queen Charlotte subspecies found in Southeast Alaska is federally listed as Threatened in adjacent British Columbia (USFWS 2012). The U.S. Fish and Wildlife Service stated estimates of less than 400 breeding pairs in all of Southeast Alaska, with some estimates as low as 100 pairs (USFWS 2007). Northern Goshawks are dependent on high volume forest with high canopy closure and the presence of trees with sufficiently large and widely spaced branches to support nests. Studies in Southeast Alaska found that nest areas contained more old forest, higher canopy cover, greater representation of multi-storied stands, fewer large openings, and less edge than randomly selected sites (Iverson et al. 1996). The Queen Charlotte subspecies tends to breed in larger, intact patches of forest rather than small isolated stands. Harvest eliminates habitat by reducing the amount of potential nest trees, and connectivity to habitats adjacent to nest areas; and it can diminish the quantity and quality of foraging habitat by reducing the abundance and availability of prey. Additionally, habitat fragmentation caused by large-scale harvesting can affect adult goshawk survival because of increased distances needed to travel to reach suitable foraging areas (COSEWIC 2013). The distinct population segment of Queen Charlotte Goshawk occurring in Alaska was not listed as Threatened in large part because the Tongass Land Management Plan (2008) provided adequate habitat for the species, including Roadless

areas (USFWS 2012). Erosion of the available old growth reserves combined with lands removed from the Tongass National Forest due to recent land exchanges could warrant new petitioning for this subspecies. The Draft EIS for Roadless Rulemaking does not adequately address how the management will ensure adequate contiguous old growth habitat for the goshawk if harvest levels or fragmentation of old growth forest occur, nor how effects would be monitored. Further, the efficacy of the current 100 acres buffer around known nests has not been rigorously evaluated for continued goshawk use and breeding success. With foraging ranges measured at a minimum of 9,872 acres and up to 133,975 acres for adult females (Flatten et al. 1991) this is a relatively small protected area, clearly designed with the assumption that suitable foraging habitat would be maintained at a landscape level.

The Marbled Murrelet is an IUCN red listed species, Audubon Watchlist species, a Species of Greatest Conservation Concern (SGCN) for the state of Alaska, and is listed as threatened from California to British

Columbia. This non-colonial seabird typically nests in the canopy of mature, low-elevation forests (Burger 2001). The primary cause of reproductive failure for Marbled Murrelets is nest predation, which increased with proximity to edge habitat (Nelson et al. 1995). Fragmentation of mature forests by roads is associated with increased predation risk, particularly by corvids (Piatt et al. 2006).This seabird has experienced marked population declines across its range due to a combination of factors including the Exxon-Valdez Oil Spill, industrial-scale logging, gillnet bycatch, and changes to marine ecosystems (EVOSTC 2014). Considering recent population declines, and the known negative effects of fragmentation on reproductive success for this species, we recommend a more thorough analysis of potential impacts of the proposed alternatives on this species.

! Management Indicator Species

The Tongass Land Management Plan (USDA 2016) wildlife forest-wide standards and guidelines (Chapter 4) directs use of Forest Plan Management Indicator Species (MIS) to evaluate the potential effects of proposed management activities affecting wildlife habitat. Multiple birds were identified as MIS in previous forest plans, including Bald Eagle, Brown Creeper, Red-breasted Sapsucker and Hairy Woodpecker. The forest updated the Tongass Plan Monitoring Program in 2016, retaining only the Bald Eagle as a landbird MIS because of transition to the 2012 Planning Rule, but stating "Tongass is deferring action on two requirements: focal species and species of conservation concern". It does not seem reasonable that in the interim MIS should be eliminated from consideration without a replacement list of focal species or species of concern. Monitoring of these landbird species has not been addressed in a Monitoring Report since 2015, nor does the planning update announce a target date or process for identification of focal species.

We have particular concern for the Brown Creeper, a previously identified MIS that is important for understanding management effects on forest-dependent species. The Roadless Rule EIS recognizes that the Brown Creeper is associated with interior old-growth forest conditions. Brown Creepers rely on larger mature trees to forage on

corrugated bark and prefer mature undisturbed forests to breed (Poulin et al. 2013); also, on the Tongass, the species may be averse to forest edges (Kissling 2003). Increases in roads and logging of high-volume old growth could negatively affect this species, as studies have shown decreases in creepers even with selective harvest (Poulin et al. 2010). The Roadless Rule states that additional creeper habitat could be lost to harvest beyond the current Forest Plan projections in all but the No Action Alternative but does not state how these changes would affect Brown Creeper populations. In addition, there is no statement on how the effects will be monitored for the Brown Creeper and other forest birds.

Continuing participation in broad-scale monitoring efforts for birds, such as the Breeding Bird Survey (BBS) and Alaska Landbird Monitoring System is encouraged. Additionally the forest should initiate more focused surveys addressing habitat needs and trends for species not frequently detected in broad scale studies, such as the Brown Creeper, if contiguous old growth habitat will continue to be reduced.

* The Tongass represents a majority of the intact temperate rainforest habitat remaining in North America.

A recent report by Rosenberg et al. (2019) indicated North America has lost approximately 3 billion birds, or a 29% drop in avian populations since 1970. The Tongass National Forest manages the majority of the Pacific Northwest rainforest habitat in the United States and therefore shoulders the burden of maintaining these habitats and wildlife dependent on them for the American public (BPIF 1999). Specific examples of northern species that are forest-dependent and in decline continentally include Varied Thrush, Pacific-slope Flycatcher, and Sooty Grouse (USGS 2019, Rosenburg et al. 2016). The DEIS analysis provides no estimate for current avian population sizes nor how the alternatives would impact these populations. The analysis should provide species-specific population size estimates for avian species of concern[mdash]particularly those dependent on

intact temperate rainforest during their annual life cycle[mdash]and how these are expected to change under each proposed alternative.

* Ecotourism is one of the best economic opportunities available for the Tongass National Forest.

Fisheries, wildlife viewing, and outdoor recreation and visitation hold the largest potential for economic growth in Southeast Alaska. Historically, old-growth logging was the centerpiece of Southeast Alaska's economic development plan. In the 1990s, the timber industry employed about 4,000 people but now employs only 300 (<1% of regional jobs in 2016) (Southeast Conference 2017). Today, government jobs, commercial fishing and seafood industry, visitor industry, health care, mining, and other sectors dominate the Southeast Alaska economy. The DEIS indicates that timber jobs in Southeast Alaska produce approximately 2% of the amount of earnings made by employees in the visitor industry, and yet the Forest Service has recently reduced investment in their Recreation program.

In 2016, the Tongass National Forest adopted a land management plan to transition out of old-growth logging over the next 15 years. Moving away from an old-growth timber economy provides an opportunity to scale up other successful sectors, such as the visitor industry, in communities looking to replace timber jobs and transition to more sustainable economies. Ecotourism is well-established in this region, and following a trend of increasing national and international tourism, the visitor industry has the strongest outlook of all Southeast Alaska industries (Southeast Conference 2017).

The Southeast Alaska tourism industry is the highest resource-based industry in the region (Southeast Conference 2016). Southeast's visitor industry has an estimated spending value of $1.17 billion and a labor income impact of $436 million in 2014-15 (Southeast Conference 2016). The visitor industry in Southeast is estimated to have employed 7,401 people in 2015, a 26% increase from 2010 (Southeast Conference 2010), and had a total employment impact on 11,200 jobs in 2014-15 (McDowell Group 2016). This visitor industry brings in nearly 1.5 million passengers; two-thirds of all Alaska visitors come to Southeast Alaska. In comparison, the timber industry (including federal, state, and private jobs) employed an estimated 321 people for a total workforce earnings of $17.3 million in 2014-15 (Southeast Conference 2016).

Based on a survey of Southeast Alaska business owners and directors, after overall quality of life, recreational opportunities are the second-most important element supporting businesses operating in Southeast Alaska (Southeast Conference 2017). In their 2020 Strategic Plan for economic development, Southeast Conference named the top priority for the visitor industry as marketing Southeast Alaska to attract more visitors and to market Southeast Alaska as a region. Along those lines, Audubon Alaska and the Juneau Audubon Society have partnered with the Tongass National Forest to create the Southeast Alaska Birding Trail, which will be launched in 2020. The birding trail is an excellent example of a non-consumptive use of the Forest that will bring ecotourism dollars into the region. More than 350 species of birds can be found in Southeast Alaska, with many of these unique to the region and therefore highly attractive to those people who enjoy seeing new species and adding to their "life list" of birds. Interesting birding areas in Southeast Alaska remain off the beaten path and represent an opportunity for local Alaskans to attract visitors and capitalize on that economic resource. About 45% of Alaska's visitors in 2016 participated in wildlife viewing, and 9% participated in birdwatching specifically (Southeast Conference 2016).

These economic factors are not adequately addressed in the DEIS. The DEIS should provide a 20-year analysis that compares the budgets of the Fisheries, Wildlife, Recreation and Timber/Planning programs across the Tongass National Forest; and based on this analysis the Forest Service should rebalance how they are investing taxpayer dollars in these important programs, with ample recognition for the long-term economic value of intact lands for providing recreational and ecotourism benefits for the visitor industry.

* Finally, the Record of Decision for the 2016 Forest Plan states "While the analysis for the 2008 Tongass Plan Amendment assumed the 2001 Roadless Rule would not apply

because it was prepared during the time the Tongass was exempt, the 2016 Tongass Forest Plan Amendment I am approving today -- and the analysis in the associated Final EIS -- is fully consistent with the Roadless Rule [emphasis added]." The proposed rule states that "From a broad standpoint, the impacts to general wildlife habitat from the proposed alternatives would be the same as disclosed in the 2016 Forest Plan FEIS due to Forest Plan standards and guidelines." However, because the 2016 Forest Plan environmental analysis assumed the Roadless Rule would stay in effect and used the configuration of land protections under the Roadless Rule to analyze the impacts of the Forest Plan, this Proposed Rule should not be implemented without analysis as a Forest Plan Amendment. Furthermore, the implications of increased flexibility for the timber program indicate this proposed rule would result in additional timber sales being planned in an integral part of the conservation strategy for the 2016 Forest Plan, and yet cumulative effects for these reasonably foreseeable future actions have not been adequately assessed. This DEIS does not present sufficient analysis for this change to the Forest Plan.

Thank you for considering our comments on the proposed changes to the Roadless Rule in the Tongass National Forest. Please feel free to contact us with any questions, clarifications, or requests for additional information.

Sincerely,

[Signatures]

Melanie Smith, Boreal Partners in Flight Co-Chair

Audrey Taylor, Boreal Partners in Flight Co-Chair

Rebecca McGuire, Alaska Shorebird Group Chair

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[Position]