

Data Submitted (UTC 11): 12/5/2019 9:00:00 AM

First name: Calvin

Last name: Casipit

Organization: City of Gustavus

Title: Mayor

Comments: RE: Alaska Roadless Rulemaking

Dear Secretary Purdue:

The City of Gustavus, Alaska has corresponded with you, Alaska Regional Forester David Schmidt, and Tongass National Forest Supervisor, Earl Stewart regarding the Department's efforts regarding the Alaska specific Roadless Rule. We sent detailed comments on Nov. 20, 2018 and Resolution CY19-31 (attached) to your Rulemaking team.

The City of Gustavus stands by the above referenced documents and remain opposed to any modification of the Roadless Rule in Alaska. The current Tongass Land Management Plan as amended in 2016 should be supported and implemented. We prefer the No Action Alternative of your Draft EIS.

Sincerely,

Mayor - City of Gustavus ,

CC: Afaska.Regional Forester - David Schmidt

Tongass Forest Supervisor - Earl Stewar

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Subject: Roadless Rule Exemption Proposal for Alaska

Reference: City of Gustavus Resolution CY 19-31 Commenting on the USFS Roadless Rule Proposal

The City of Gustavus and the community generally have long advocated thoughtful forest management and protection for the Tongass National Forest, and particularly for lands in our proximity in the Icy Strait region. In our view, timber should be made available for regional use, but on a small, sustainable scale, and in ways that fully protect other values. We are proud to say that our efforts, in concert with other Alaskans, have resulted in a framework of protection and use that makes our region an example of sustainability. One does not have to go far to find examples of more destructive practices.

The State of Alaska is now proposing to the US Forest service that a form of this protection, the Roadless Rule, be revised in ways that could reopen certain places along Icy Strait to large-scale logging. We oppose that. The attached Resolution# CY 19-31 provides the City's general rationale in that regard. The purpose of this letter is to spell out our history with, and values we attach to, areas and issues of particular concern.

HOMESHORE (Point Couverden)

This area's name refers to its long use and residency by local people, which speaks to its values in a host of ways. Large-scale logging in this area at the northeastern margin of Icy Strait began over 30 years ago. Gustavus opposed the scale and subsidization of the logging and roading that has gone on there but has been more supportive of the small-scale sales grants to local mills in recent years. The initial road system was terminated near Point Couverden, with the understanding that it might someday be extended northeastward into

what is classified under the present Tongass Land Use Management Plan (TLMP) as Old-Growth Habitat. The City would oppose that extension on the basis that the area has already been too heavily exploited.

#### POINT ADOLPHUS/ MUD BAY/IDAHO INLET

Gustavus advocated successfully for designation of this area as "legislative LUD II" in the Tongass Timber Reform Act, and later for its inclusion in TLMP and as a Roadless Area . It includes numerous fish streams, anchorages, deer hunting areas, campsites, berry patches, and summer tourist visitation sites of great value to our community and others along Icy Strait. In our view, this area (and all LUD II areas) have been given formal protection by Congress and should certainly not be considered for exclusion from roadless designation.

#### CHICKEN CREEK

This large watershed across Icy Strait from Gustavus contains the most extensive stands of high-volume timber left in our region. The creek system is host to large runs of pink, chum, and especially coho salmon. Its shores are of value to locals for recreation, deer hunting, and, in spring, wild plant gathering. Its value as old-growth habitat, already high, is raised in importance because the lands to eastward have been so heavily logged and roaded by Sealaska Corporation. [middot]The community worked hard and successfully to stop a large timber sale there about twenty years ago, and to get the watershed designated in TLMP as Old-Growth Habitat. However, this designation is strictly administrative. At present, it is also protected by the Roadless Rule, and we feel strongly it should stay that way.

#### CLIMATE CHANGE/ECOSYSTEM SERVICES

Climate change is a fact. The urgency of slowing and eventually stopping the drivers for climate change have been made all the more clear in the Oct. , 2018 Intergovernmental Panel on Climate Change Special Report Global Warming of 1.5 [deg]C. As noted in the City's resolution, the amount of stored carbon in our intact old-growth forest and soils of the Tongass National Forest represents one of the greatest carbon stores in the world. Intact roadless areas on the Tongass are essential for maintaining America's resilience and slowing down climate change throughout the world , and they should not be diminished. Additionally, the ecosystem services-clean water, clean air, fish and animal habitat, etc.-that the Tongass provides 24/ 7 at no cost to taxpayers must be a major consideration in the management of our forest. The Roadless Rule serves this purpose admirably.

#### CLOSING REMARKS

Many of us in Gustavus are dismayed that the Forest Service, despite overwhelming public support for the Roadless Rule, is working to relax that rule. In doing so, the Forest Service is severely jeopardizing its relationship with the communities it is supposed to serve. People need to be confident that forest management decisions have a sound scientific basis, not-as is the case with the attempt to relax the roadless rule-the whims of politics or ideology. The damage to the Forest Service's credibility, even under the best of circumstances, may take decades to repair.

On behalf of the City Council of Gustavus, I urge that the USFS 2001 Roadless Rule should remain intact for Alaska and the Tongass National Forest Roadless Areas should retain the full protection of the existing rule.

Sincerely,

Calvin Casipit

Mayor, City of Gustavus, Alaska

Enclosure: (1) City of Gustavus, Alaska Resolution CY19-31

cc: Dave Schmid, Acting Regional Forester

## CITY OF GUSTAVUS

### RESOLUTION CY 19-31

#### A RESOLUTION CITY OF GUSTAVUS COMMENTING ON THE USFS ROADLESS RULE

WHEREAS, The City of Gustavus is a distinctive community that prospers by and through protection of its natural resources; and

WHEREAS, the sustainability and resilience of our Gustavus economy and our lifestyles depend upon nurturing and sustaining the natural resources of our forests, rivers, and ocean, locally and regionally in Southeast Alaska; and

WHEREAS, many Gustavus residents obtain their livelihood from environmentally dependent tourism and fishing activities; and

WHEREAS, the Roadless Rule was first adopted in 2001 to protect over 50 million acres of our nation's most essential and intact roadless areas in National Forests throughout the United States; and

WHEREAS, a USFS scoping meeting on the future of the Roadless Rule in Alaska held recently in Gustavus was well attended by Gustavus residents; and

WHEREAS, roadless areas on Tongass represent some of the most spectacular and unique roadless areas anywhere in the national forest system and support hunting, fishing, customary and traditional uses, unparalleled outdoor recreation opportunities, and

opportunities for businesses; and

WHEREAS, the amount of stored carbon in our intact old-growth forest and soils of the Tongass National Forest represents one of the highest carbon stores in the world, and the conservation of intact inventoried roadless areas on the Tongass is essential for maintaining America's resilience and slowing down climate change throughout the world; and

WHEREAS, the Tongass provides a wide range of ecosystem services beyond carbon sequestration to residents and visitors alike on a 24/7 basis naturally and at no cost to the taxpayer; and

WHEREAS, increased logging of mature forest in the existing roadless areas of the Tongass will seriously impact the ability of the forest to provide these vital ecosystem services; and

WHEREAS, the community of Gustavus in the 1980s successfully advocated for wilderness status for Icy Strait islands and for the designation of the Chicken Creek watershed and much of northwest Chichagof Island as roadless lands; and

WHEREAS, the community of Gustavus has opposed the large-scale roading and logging at Homeshore (Point Couverden); and

WHEREAS, according to the State of Alaska's own economic experts, Tongass timber is uncompetitive because of fundamental, permanent changes that have occurred in global timber markets, high labor costs, distance from markets, and less-expensive substitutes; and

WHEREAS, timber from Tongass forest lands has always been sold at a significant loss to the US taxpayers; and

WHEREAS, 374 timber-related jobs in Southeast Alaska in 2017 represented only 0.78 percent of total Southeast Alaska employment; and

WHEREAS, if the USFS and the State of Alaska are interested in increasing employment on the Tongass, there are numerous opportunities to employ forest workers to restore forest ecosystems damaged by past logging activities;

THEREFORE BE IT RESOLVED, that, given the serious and long-lasting impacts of any reduction in current Roadless Rule protections on the Tongass, the City of Gustavus strongly supports lasting protection for all inventoried roadless areas on the Tongass National Forest as provided for in the 2001 Roadless Rule. There should be no exemption from the Roadless Rule for Alaska and there should be no Alaska-specific roadless rule; and

BE IT FURTHER RESOLVED, that the City of Gustavus urges that sustainable timber production opportunities be identified on federal, state, and private forest lands, particularly focusing on second-growth timber, outside the existing roadless areas, in support of a domestic wood products industry suitable in scale to the limited demand for products from this region; and

BE IT FINALLY RESOLVED, that the City of Gustavus urges the USFS to invest in programs and employment opportunities for Southeast residents to restore the health and productivity of Tongass forests and streams, as a means of supporting vital ecosystem services such as carbon sequestration, small-scale timber production, fish and wildlife populations, natural vistas, visitor amenities, subsistence, hydrological resources, and more.

The City of Gustavus submits the attached letter with expanded and specific comments for our local area.

PASSED and APPROVED by the Gustavus City Council this 19th day of November, 2018.

[Attachment is a pdf document identical to Letter text]

[Position]