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Comments: For the past eighteen years, national roadless forest areas, defined as public lands without roads, logging, mining or any other industrial development, have been protected by the US Forest Service Roadless Area Conservation Rule. The Tongass National Forest, in Southern Alaska, is the largest national forest and contains one of the largest remaining tracts of ancient, old growth temperate rain forest in the world. It houses some of the oldest trees in the nation some over 800 years old and provides essential habitat for a lot of wildlife, biodiversity and incredible ecosystem. It provides essential habitat to the largest population of Bald Eagle in the world, significant and diverse habitat to, among others, Pacific salmon, grizzly bears, wolves, Sitka-tailed deer, Northern Goshawks. For now, according to the USDA Forest Service, there does not appear to be any endangered species, however this might change if the forest is highly impacted by logging and the increasing climate change [1]. In the past century, the forest has been impacted and damaged by logging efforts, which has been threatening its conservation. Clear-cutting and road building has had and will have devastating impacts for the future of all living organisms in the area. The negative consequences of cutting down all these old-growth trees will outweigh the benefits. The timber industry will not survive if the exploited land and plantation of trees are not expanded. These trees cannot be replaced easily and quickly as it takes them centuries to reach the size and quality of wood they have today. The industry might be working incredibly well but will stop being this successful when the necessary raw material will become insufficient. In addition to the issue of the timber industry, a recent study, published in the journal Ecosphere, has found that old-growth forests are essential in event of very severe fires. The data has shown that old-growth forests are three times more likely to burn at low-severity fires than younger forests, which will be more prone to burn at high-severity fires. Because old-growth forests may be refuges of low-severity fire on a landscape that experiences moderate to high-severity fires frequently, they could be integral as biodiversity refuges in an increasingly fire-prone region [2]. Finally, the conservation of biodiversity in old growth forest is extremely important. The number of different species of organisms that inhabit a given area, is a common marker of ecological health. Having a large number of species typically implies that there is a good balance of available resources, and a relative lack of outside stressors that could potentially be harming the living organisms in the environment. An old-growth forest may have more fallen and decaying trees, for example, as well as trees with more established root structures and a higher average height. All of these help shape the local environment, providing a greater variety of habitats, greater access to some important nutrients, greater soil drainage and aeration, and other benefits. Exploiting these forests may have irreversible consequences on the nature, the organisms habitats and the surrounding populations benefiting from the forests resources to survive. It is thus, for the reasons stated above, important to prevent the Roadless Area Conservation Rule to be exempted for the Tongass National Forest.

[1] Tongass National Forest, USDA Forest Service, https://www.fs.usda.gov/detail/r10/about-region/overview/?cid=fsbdev2_038671

[2] Damon B. Lesmeister et al, Mixedseverity wildfire and habitat of an oldforest obligate, Ecosphere (2019)

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