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First name: John

Last name: Schoen

Organization:

Title:

Comments: Secretary Sonny Perdue

Department of Agriculture

Attn: Alaska Roadless Rule

USDA Forest Service

P.O. Box 21628

Juneau, Alaska 99802

Re: J. Schoen & M. Kirchhoff Comments on the Draft Environmental Impact Statement for Alternatives to a Proposed Alaska Roadless Rule

Dear Secretary Perdue,

This letter provides you with our comments on the draft environmental impact statement for alternatives to a proposed Alaska roadless Rule. We are both retired Alaskan wildlife biologists with many years of experience conducting wildlife research on the Tongass National Forest. We have both lived and worked in Juneau, Alaska and have, combined, over 75 years of Alaska wildlife experience. The following letter was formerly published in an Anchorage Daily News Commentary on October 27, 2019.

The Trump and Dunleavy administrations' plan to exempt Alaska's Tongass National Forest from the National Roadless Rule is ecologically and economically unwise. The Tongass is our nation's largest national forest and contains the greatest remaining area of old-growth temperate rainforest in North America. The Tongass provides critical habitat for fish and wildlife, including all five species of salmon, deer, bear, and other species uniquely adapted to this rainforest ecosystem, such as the Alexander Archipelago Wolf, the Queen Charlotte Goshawk, the Prince of Wales Flying Squirrel, the Marbled Murrelet, and the Prince of Wales Spruce Grouse. Not only does the Tongass support vibrant tourism and fishing industries as well as local subsistence use of fish and wildlife, it also stores more carbon than any other national forest, and plays an important role in moderating climate change.

Supporters of the timber industry point to the small percentage of land area logged as an indicator of the impact. This is misleading because only a third of the Tongass supports forests of potential commercial value, and only a small fraction of that is economically valuable. The timber industry has always targeted (high-graded) the largest

and oldest trees, but those large-tree old-growth stands have always been rare on the Tongass. An analogy would be fishermen catching only a small percentage of all the salmon, but catching nearly all the king salmon (the least abundant but most valuable species). Seven decades of high-grading has dramatically depleted the Tongass Forest's largest (4-10 feet in diameter) old-growth trees. And those rare, old-growth stands provide some of the most valuable fish and wildlife habitats on the Tongass. If the new Prince of Wales timber sale moves forward and the Roadless Rule protections are removed, most of the remaining large-tree forest stands will be clear-cut and their habitat values for wildlife and salmon will be permanently lost. The ecological structure of old-growth forests are not renewable on 100-year timber harvest schedules.

There is strong scientific consensus on the ecological importance and rarity of old-growth forests. In 2003, former Forest Service Chiefs Jack Ward Thomas and Mike Dombeck urged that "[hellip]harvest of old growth from the national forests should come to an end[hellip]" In 2015, seven scientific societies, representing a combined membership of over 30,000 scientists and natural resource professionals, sent a joint letter to Secretary of Agriculture Vilsack requesting that the timber industry on the Tongass transition from old-growth logging to second-growth harvest as rapidly as possible. Today, the Tongass is the only national forest that still clear-cuts old growth. And it is past time to bring that practice to an end.

Exempting the Tongass from the Roadless Rule and further high-grading of the rarest, most valuable old growth will result in unsustainable forest management and risk significant impacts to fish and wildlife as well as jeopardize two of southeast Alaska's significant economic drivers: fisheries and tourism. According to Taxpayers for Common Sense, the Tongass Forest has lost \$30 million on timber sales annually over the last two decades. For both ecological and economic reasons, this is why the Tongass should NOT be exempted from the Roadless Rule.

Thank you for considering our comments and recommendation.

Sincerely,

John W. Schoen, Ph.D.

Wildlife Ecologist, retired

Anchorage, AK

Matthew D. Kirchhoff, M.S.

Wildlife Ecologist, retired

Anchorage, AK

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