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Organization:

Title:

Comments: Comments on The Alaska Specific Roadless Rule

Please make these comments publicly available online. Thank you.

Secretary Purdue:

My name is Marian Allen and I have lived in Sitka, Alaska since 1979. I am writing a comment on the Alaska Roadless Rule DEIS because I am very concerned with the process being used and the results should Alternative 6, full exemption of the Tongass from the Roadless Rule, be adopted. I depend upon the Tongass for food, for recreation and for spiritual connection. In the past I have depended upon the Tongass for my livelihood, as a handroller and as an outdoor safety and survival instructor. Both of these occupations are adversely affected by clearcutting. I depend upon the foods I collect throughout Sitka Sound and the waters and beaches from Goddard Hot Springs to Deadman's Reach in Peril Straits. All of Kruzof Island is important as a recreational area, If Alternative 6 is chosen, many of the areas I use for these subsistence and lifestyle activities could be impacted by road building and logging. The forest provides a place for spiritual renewal and retreat into wilderness for me, so rare in this time, and so important. If many of these areas, like the Salmon Lake area, in back of Indian River Valley, Peril Straits, Ushk Bay and the Hoonah Sound forests are open to roads and logging, my grounding, my spiritual connection with the Earth and our place in this universe will suffer. When I walk in the woods I am unable to traverse a clear-cut even if it is 50 years old. Clear-cutting any of these areas would destroy that connection for anyone. Protecting the T77 and the TNC conservation priority areas with no roads is important to maintaining all of these things.

If the Roadless Rule stands as is, then our responsibilities to mitigate the effects of climate change and continue to use the forest in responsible, sustainable ways will be met. The Tongass is the largest national forest in the US, the largest temperate rain forest in the world, that sequesters 10 - 12% of the carbon of the national forests in the U.S. If we let the Roadless Rule stand as it is, roads will be able to be built to access hydro projects and mines, for communication and other uses. Since 2009, 48 roads have been built to access hydro development, mining exploration and community access. They have had to meet responsible standards, which makes sense for the sustainability of the region and health of the forest and world. In fact, the only new activities that abandoning the Roadless Rule would allow are basically unlimited access to more industrial scale Old Growth logging and the possibility of new roads being built in an environmentally dangerous way and place. If the Roadless Rule stands as is, the economic drivers in Southeast Alaska, commercial fishing and the visitor industry, will continue to thrive. They require a healthy forest.

The preferred alternative, full exemption (Alternative 6), was arrived at in a very undemocratic way. The people of Southeast Alaska have overwhelmingly said, "Leave the Roadless Rule in place." The State of Alaska is not listening to its inhabitants, and your superiors aren't interested in our day-to-day needs either. They claim that a full exemption is needed for rural economic development opportunities. However, we citizens know that a full exemption would open the forest to clear cutting the remaining Old Growth trees and once they are gone, the area would not support the activities so important to our subsistence activities, culture and

lifestyles. In fact, it wouldn't even create what the State claims it would do. Instead, it would harm the visitor and commercial fishing industries, which are the sustainable economic drivers in rural Southeast. It would negatively impact the balance of economic development and conservation, which the current Roadless Rule does balance. In short, if we weaken the Roadless rule, many will suffer. Our economic drivers depend upon a healthy forest. Visitors do not come here to view large swaths of clear-cut forests. The fishing industry is directly linked to Old Growth forests because salmon carcasses provide important nutrients to the forest, to the bears and other creatures, who carry carcasses away from streams, providing fertilizer further from streams. The forest, in turn, provides the conditions for the spawning grounds for the nursery for salmon fry while they mature until old enough to migrate to the ocean. As a former handtroller, I know firsthand how important this rhythm is. As climate change creates more uncertain conditions for the survival of salmon, we must be as conserving of their forest habitat in the streams and rivers as possible. Very selective cutting of Old Growth for very specialized uses such as musical instruments is sustainable, but this is allowed under the Roadless Rule. Cutting must be at a sustainable level and industrial scale logging does not meet this standard.

In addition, if we allow further harvest of the Tongass, it will cost the American taxpayer a lot of money. Road building costs run from \$160,000 to \$500,000 dollars per mile in the Tongass. The annual subsidy for the industry here is around \$20 - \$24 million, which is paid by the American taxpayers. Because we are remote, the cost of importing and exporting anything is higher than in the Lower 48, which makes our products non-competitive. The only market available is one for logs in the round. Without secondary processing here, we are not providing much work for residents of Southeast Alaska, and what work there is would disappear as soon as the trees are gone. Instead of opening the forest to many more roads that would not be maintained, and thus present impediments to salmon reaching their spawning grounds, a more productive and sustainable route would be to encourage, and pressure, Congress to fund repair of the 5,000 miles of logging roads in the Tongass, including old culverts, which in their disrepair inhibit access of salmon to their spawning areas. There is a \$68 million backlog of repair work needed on existing roads. Maintain what you have; don't create a bigger problem.

I suggest that a responsible way to weigh the different alternatives for an Alaska specific Roadless Rule would be to look at how much each option requires the American taxpayer to subsidize it, it's importance to local cultures, economies and lifestyles, and its importance to global health given that we are facing a major climate emergency. We know that the timber industry in the Tongass supports less than 1% of jobs in Southeast Alaska and costs \$20 - \$24 million a year to American taxpayers. Fishing and tourism, on the other hand, support 25% of the jobs in Southeast Alaska and are not subsidized at all. The Tongass is an important part of the last habitat that nurtures the last major wild salmon populations in the world. This magnificent forest supplies the nursery for about 49 million wild salmon a year to the world. The indigenous cultures who have thrived here since time immemorial depend upon a healthy forest for food, culture, and spirituality, and villages have been suffering from the effects of logging done in the last few decades. Perhaps most importantly, the Tongass also plays an important role in mitigating the effects of climate change. Looking at the alternatives in this light it is obvious that Alternative 6, excluding the Tongass from the Roadless Rule, makes no sense. Alternative 1, leaving it in place, makes total sense.

In conclusion, I need to convey the importance of maintaining a healthy Tongass for my grandchildren, and their grandchildren and their grandchildren. The changes in the world we are currently living in can create an uninhabitable Mother Earth so we have an urgent responsibility to treat this amazing planet as conservatively, as cautiously, as lovingly if you will, as possible. Opening up the Tongass to unrestricted road building, to more clear cutting of Old Growth trees is the opposite of that. Leave the Roadless as is!

Sincerely,

Marian Allen

Sitka, AK 99835

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