Data Submitted (UTC 11): 12/16/2019 9:00:00 AM
First name: maximilian
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Organization:
Title:
Comments: I write in support of Alternative 1, the No-Action Alternative for the Draft Environmental Impact Statement on the Proposed Alaska Roadless Rule.

The Tongass National Forest is the largest coastal temperate rainforest in the United States. 16.7 million acres. And it's value in providing clean water for fish and wildlife habitat is essential to the economic and ecological health of Southeast Alaska. I strongly oppose any efforts to weaken protections for Roadless areas in the Tongass National Forest.

Tongass - a Tlingit people at the mouth of Portland Canal.

The Tongass National Forest is the northernmost temperate rainforest in North America. It is the nation's largest temperate rainforest. 16.7 million acres. Old-growth hemlock, spruce and ceder. Some trees up to 800 years old.

Tongass National Forest is home to bald eagles. "The highest nesting density of bald eagles occur on the islands of Southeast Alaska, where they nest in old-growth timber along saltwater shorelines and mainland rivers," states the Alaska Department of Fish and Game. Tongass National Forest is home to mountain goats, brown bears, black bears and Sitka black-tail deer. Tongass National Forest receives over 200 inches of rain per year in some locations. It is also home to the Alexander Archipelago wolf. Tongass National Forest is a salmon forest where the land is connected to the sea. All five species of Pacific salmon spawn in the clean, clear rivers of Tongass National Forest.

The Sitka spruce is an important tree in the function of coastal temperate rainforest and the Tongass National Forest in general.

According to the United States Forest Service the Sitka spruce is a native, long-lived (greater than 800 years), evergreen, monoecious tree. Female strobili are produced at the ends of primary branches near the top, while the male strobili are positioned lower in the tree on secondary branches.

Sitka spruce is the world's largest spruce. It can obtain heights of greater than 210 feet (65m) with a d.b.h. of 16 feet (5m) on better sites. The base of the bole is buttressed. When forest grown the bole is long and free of lower limbs.

The root system of Sitka spruce is shallow and plant like with long lateral roots with few branchings. On deep well-drained soils the root system may reach depths of 6.5 feet (2m), especially on alluvial soils. Root grafting often ocurs between roots of the same tree and adjacent trees.

Sitka spruce forests in various phases of succession provide habitat, in many cases critical habitat, for a large variety of mammals, game, and non-game birds, reptiles, and amphibians. It's value as a browse species for large ungulates is poor, while it has fair to good value for some game birds.

Sitka spruce forests provide hiding and thermal cover for a large variety of mammals. Old-growth Sitka spruce forests in Alaska and British Columbia are critical winter habitat for the Sitka deer. Old growth provides thermal cover and acts as a snow screen, allowing easier access to browse species. Sitka deer require large blocks of old growth from sea level to the alpine and subalpine environments for migrational movements from summer to winter range. Sitka spruce forests also provide habitat for Roosevelt elk, woodland caribou, Alaskan brown bear, and mountain goat.

Sitka spruce provides good nesting and roosting habitat for avifauna. Snags and live trees with broken tops provide nesting habitat for primary and secondary cavity nesters. The Bald Eagle uses primarily (greater than 90 percent) Sitka spruce for nesting trees on Admiralty Island, and also uses them as roosting trees on Admiralty Island, and also uses them as roosting trees to survey the incoming breakers for food. The peregrine falcon in coastal British Columbia uses Sitka spruce for platform nesting and secondary cavity nesting.

Sitka spruce, as one of the most important timber species and components of old-growth habitat, has recently been the center of many management concerns. Proposals for changes in timber harvest areas and methods have been explored by Nyberg and others and Schoen and Kirchhoff. They provide in-depth information and management alternatives.

Wildlife habitat: Even-aged management of the species results in reduced habitat for the black-tailed deer. Shrub fields created after clearcutting are of limited use to deer in the winter. The depth of snow accumulation is greater, and snow persists longer in the clearcuts, reducing the time available for browsing. The forage in clearcuts is less digestable than that grown in the shade of the preharvest stands. Also, the large amount of slash resulting from clearcutting old-growth Sitka spruce impedes movement of large ungulates, especially during winter migration. Lastly, once the regeneration has reached canopy closure (20 to 30 years), the understory production is greatly reduced for at least the next 100 years, compared to old-growth stands with their various stages of regenerarion.

Alaback studied ways to reduce the negative impact of clear-cutting on Sitka deer. Thinning the stands prior to canopy closure (less than 25 years) seems to be the best method for areas already cut. Thinning to 12 x 12 feet

(3.5 x 3.5m) spacing results in the most diverse vegetation. Once canopy closure has occurred (greater than 30 years), uneven-aged management practices can result in the creation of gaps in the canopy, which in turn will allow for a more diverse understory.

Elevation: Sitka spruce grows from sea level to timberline in Alaska (0 to 3,900 feet) 0-1,189m)) with elevational limitations of 2,000 feet (600m) in Washington and 1,500 feet (350m) in Oregon and California.

Associates: In addition to those listed under Distribution and Occurrence, Sitka spruce's overstory associates include mountain hemlock (Tsuga mertensiana), Alaska-cedar (Chamaecyparis nootkatensis), lodgepole pine (Pinus contorta), and western white pine (P. monticola).

Because of the critical value of Sitka spruce to the well functioning ecosystems on Tongass National Forest, I strongly oppose any efforts to weaken protections for Roadless areas in the Tongass National Forest.

I write in support of Alternative 1, the No-Action Alternative for the Draft Environmental Impact Statement on the Proposed Alaska Roadless Rule.

Old-growth Sitka spruce is of critical importance to bald eagles for nesting and roosting. Because of this, I strongly oppose any efforts to weaken protections for Roadless areas in the Tongass National Forest.

The Alaska Department of Fish and Game states "Alaska has the largest population of bald eagles in the United States, about 30,000 birds. Bald eagles are often found along Alaska's coast, offshore islands, and Interior lakes and rivers. Most bald eagles winter in southern Alaska but some leave the state during cold months. In the Chilkat Valley, over 3,000 birds may congregate in late fall and early winter to feed on spawned-out salmon."

"The highest nesting densities occur on the islands of Southeast Alaska where bald eagles usually nest in old-growth timber along saltwater shorelines and mainland rivers."

"In 1917, the Alaska Territorial Legislature, in response to claims by the salmon industry and coastal fox farmers that eagle predation was competing with their livelihood, imposed a bounty on eagles. Though the claims were later largely discredited, the bounty system lasted for 36 years and led to the killing of a confirmed 120,195 eagles and undoubtedly countless more for which no bounty was paid. The bounty was removed in 1953 and with Alaska statehood in 1959, bald eagles in Alaska came under the federal Bald Eagle Protection Act of 1940. The act made it illegal to kill or possess an eagle, alive or dead, or to possess any part of an eagle, including feathers."

Here we have an example of what happens when short-sighted policies to protect industry come into conflict with wildlife

Protecting bald eagle habitat in Southeast Alaska is critical for allowing our national symbol to endure into the future. Repealing the protections of the Roadless Rule threatens old-growth timber where bald eagles nest and roost. I write in support of Alternative 1, the No-Action Alternative.

Southeast Alaska is home to a rare and unique variation of the American black bear, the blue bear, designated Ursus americanus emmonsii in 1895. These bears are native to only one place in the world: Southeast Alaska. The "blue" coloring of the bear's fur is a recessive gene and the hair coloring appears to be the only difference. Blue bears are known as "glacier" bears. They are some of the most rare bears in the world. Not much is known about them or their population because their numbers are so few. They live within a 100 mile radius of Yakutat. They live in Glacier Bay National Park and Preserve and Tongass National Forest. They have been spotted as far East as Juneau.

Weakening protections on the Tongass National Forest may threaten crucial habitat to this rare and unique bear which is only found in Southeast Alaska. I write in support of Alternative 1, the No-Action Alternative for the Draft Environmental Impact Statement on the Proposed Alaska Roadless Rule.

The Alexander Archipelago wolf, which is a subspecies of grey wolf, lives on the Tongass National Forest in Southeast Alaska.

(Remainder Excerpted from Schoen and Person, 2007*) As a result of the isolated and naturally fragmented geography of Southeast Alaska, the Alexander Archipelago wolf (Canis lupis ligoni) is potentially more sensitive to human activity and habitat disturbance than elsewhere in the state. This greater sensitivity is particularly a concern in the southern archipelago where deer populations are strongly influenced by the loss and fragmentation of old-growth forest habitat.

About 296,000 acres have been logged on Prince of Wales and adjacent Islands. As young clear-cuts close over, habitat quality will be diminished and deer numbers will decline. Declining deer populations will stimulate more pressure by local hunters and trappers for reducing wolf numbers. The expanding road system will further increase hunting and trapping pressure on the local wolf populations.

Person et al. (1996) documented wolf mortality on Prince of Wales Island greater than 45% during some years.

An expanding road system will enhance human access and increase both legal and illegal hunting and trapping of wolves in a region where enforcement is difficult. Therefore, wolf populations on Prince of Wales and adjacent islands will face two significant problems: declining abundance of deer and increasing risk of intensive and unsustainable hunting and trapping mortality.

The wolf population in Southeast likely numbers fewer than 1,000 animals. This population is further subdivided into mainland and island populations, potentially increasing the risks of maintaining viability for some population segments.

Conservation measures necessary to maintain viable and productive wolf populations in the southern archipelago should include (within each biogeographic province where wolves occur) the maintenance of large blocks of high-quality deer habitat, including medium and large-tree old growth at lower elevations. These reserves should also prohibit or minimize road access to prevent overharvest of local wolf populations. In some areas with extensive logging and road infrastructure, road access may need to be closed and forest restoration activities initiated.

To many people, both in Alaska and the lower 48 states, Alaska wolves represent a symbol of wilderness and ecosystem integrity. In some of the lower 48 states, wolf populations are listed as endangered or threatened under the Endangered Species Act and in others they were recovered but at great expense and effort.

Alaska has the opportunity and responsibility to avoid the mistakes that lead to this situation in the lower 48 states. Because of its large area requirements and ecological position as a top-level carnivore, the wolf represents an important umbrella species for maintaining ecosystem integrity throughout it's range in Southeast. And because of its vulnerability to cumulative human activities, the wolf also serves as an indicator of wildlands values. These attributes justify identifying the wolf as a focal species for ecosystem management throughout it's range in Southeast and the Tongass National Forest.

*Schoen, J. and D. Person. Alexander Archipelago wolf. In: Schoen, J.W. and E. Dovichin (editors). 2007. A Conservation Assessment and Resource Synthesis for The Coastal Forests & Mountains Ecoregion in Southeastern Alaska and the Tongass National Forest. Audubon Alaska and the Nature Conservancy. Anchorage, AK. Chapter 6.4

To protect the vital habitat of the Alexander Archipelago wolf, I write in support of Alternative 1, the No-Action Alternative for the Draft Environmental Impact Statement on the Proposed Alaska Roadless Rule.

For more than two decades conservation groups have argued wolf populations that live in Tongass National Forest, specifically Game Management Unit 2, Prince of Wales Island and nearby islands, are in decline from timber harvest, road building, hunting and trapping, are at risk, and deserve endangered or threatened species

under the Endangered Species Act.

The Alexander Archipelago wolf was denied that protection by the United States Fish and Wildlife Sevice.

The United States Fish and Wildlife Sevice states "Although the Alexander Archipelago wolf faces several stressors throughout it's range related to wolf harvest, timber harvest, road development, and climate related events in Southeast Alaska and coastal British Columbia, the best available information indicates that populations of it's range are likely stable."

The U.S. Fish and Wildlife Sevice also states "On Prince of Wales and nearby islands, the cumulative effect of stressors has caused an apparent population decline, with further decline predicted over the next 30 years. However, wolves here constitute only 4 percent of the range of the Alexander Archipelago wolf and 6 percent of it's current estimated total population. Therefore, negative population impacts on these islands will likely not affect the rangewide population in a significant way. Nonetheless, the Service believes careful management actions and decisions are needed to ensure the future health of the population at these sites."

According to the Alaska Department of Fish and Game the Alexander Archipelago wolf is highly dependant on the loss of long term carry capacity for deer primarily due to extensive timber harvesting, increased mortality of wolves associated with improved human access from roads and continued high harvest of wolves by humans.

The Alaska Department of Fish and Game states in the Alexander Archipelago wolf profile:

"The Alexander Archipelago wolf (Canis lupus ligoni) in the Tongass National Forest of southeast Alaska. Information concerning the morphology, distribution, taxonomy, genetics, and ecology of wolves is presented. Three issues for the conservation of wolves in southeast Alaska are discussed: loss of long-term carrying capacity for deer due primarily to extensive timber harvesting, increased mortality of wolves associated with improved human access from roads, and continued high levels of harvest of wolves by humans. Continued timber harvesting at current levels and by current methods will likely have adverse consequences for some segments of the wolf population. Although some short-term regulatory changes and the management of road access may need to be considered to keep wolf harvest at a sustainable level, the most important consideration is to maintain long-term carrying capacity for deer, the principal prey for most of the wolf population. A series of old-growth forest reserves may provide an effective strategy to increase the likelihood that wolves will persist where extensive timber harvesting has occurred, or is planned.

Keywords: Alexander Archipelago wolf, Canis lupus ligoni, effects of logging on wildlife, population dynamics of wolves, predator-prey dynamics, roads and wolf mortality, Tongass National Forest, southeast Alaska.

SUMMARY

The Alexander Archipelago wolf (Canis lupus ligoni) occupies most of southeast Alaska from Yakutat Bay to Dixon Entrance except for Admiralty, Baranof, and Chichagof Islands. Based on common cranial characteristics, the Alexander Archipelago wolf was considered by early taxonomists to be a distinct subspecies. Recent taxonomic work suggests that these wolves may have originated from a larger subspecific group (C. l. nubilus) that at one time inhabited most of the contiguous Western United States. Wolves probably entered southeast Alaska sometime after the Wisconsin glaciation, following the northward expansion of black-tailed deer (Odocoileus hemionus) along the coast. The hypothesis of a southern origin is supported by recent genetic research showing that wolves in southeast Alaska share a common allele not found in a sample of wolves from interior Alaska or the Yukon. The population is relatively isolated from other wolf populations by water and mountain barriers.

A study of the ecology of wolves in southeast Alaska was conducted on Prince of Wales and Kosciusko Islands from 1992 to 1995. Average home-range size of radio-telemetered wolves was 280 square kilometers (109 mi[sup2]), with 75 percent of the radio locations for each pack within "core areas" averaging 124 square kilometers (48 mi[sup2]). Pack sizes ranged from 2 to 12, with 7 to 9 typical in early autumn. Annual rates of dispersal averaged 39 percent; 71 percent of dispersers were adults 2 years old and older. Dispersal distances were relatively short (13 to 182 kilometers [5 to 71 mi]) presumably due to inter-island water barriers. Wolf movements were more restricted during the denning and pup-rearing season (mid-April through August), when home ranges were 50 percent smaller than in winter. Of the 14 dens located in this study, all were in old-growth forest within 100 meters (328 feet) of fresh water. One den was under a large log; all others were in cavities beneath the roots of large trees.

Sitka black-tailed deer (O. h. sitkensis) were the primary prey of wolves. Deer remains occurred in 90 percent of wolf feces (scats) examined from Prince of Wales Island. Deer occurred exclusively in 45 percent of the scats. The only other prey occurring with >10 percent frequency was beaver (Castor canadensis). Other prey consumed in small quantities included black bears (Ursus americanus), mustelids, other small mammals, birds, and salmon (Oncorhynchus spp.). Using information on diet composition, consumption rates, and body size of prey, we estimated that wolves on islands in southern southeast Alaska consumed an average of 26 deer per wolf per year (SE = 4.1).

Most of the wolves in southeast Alaska occur on the large islands south of Frederick Sound. These islands (game management units 2 and 3) support approximately 60 to 70 percent of the total population. By extrapolating from empirical population estimates for Prince of Wales Island, we estimated the autumn 1994 population of wolves in southeast Alaska at slightly over 900 animals (SE = 216). Hunting, trapping, and illegal killing accounts for a high percentage of the mortality in wolves. Based on analysis of trapping and hunting morality by wildlife analysis area (WAA), we determined that mortality was correlated with the linear kilometers of road within WAA's. Indeed, reported wolf harvest increased twofold when the length of road below 370 meters (1200 ft) elevation exceeded 95 kilometers (59 mi), regardless of size of the WAA. This corresponded to an approximate road density of 0.4 kilometer per square kilometer (0.7 mi/mi[sup2]), most of which were open to human access. Between 1993 and 1995, the average annual mortality in a total sample of 24 radio-collared wolves on Prince of Wales Island was 50 percent SE = 13 percent). If applied to the overall wolf population on Prince of Wales Island, this rate of mortality would not be sustainable.

Wolf populations are closely tied to population levels of their ungulate prey. For southeast Alaska, we predicted the number of deer required per wolf to attain equilibrium between deer and wolves by using a Monte Carlo simulation of a model that calculated equilibrium ratios for wolves and their ungulate prey. We assumed a high average finite rate of increase for deer (1.3), a mean predation rate of 26 deer per wolf per year, and a human harvest of deer equal to 21 percent of the annual increment. Our results suggest that 170 to 180 deer per wolf are needed for a 95-percent probability of equilibrium, provided that mortality of deer due to predation is primarily additive. We cannot suggest a minimum deer population because we do not know what constitutes a minimum viable wolf population either demographically or genetically. Nevertheless, if we expect to sustain the current postdenning population of 250-300 wolves on Prince of Wales Island (along with subsistence and sport harvests of deer) with a high probability of attaining equilibrium, then sufficient habitat is needed to support 42,500 to 54,000 deer.

Our review raises a number of issues concerning the long-term sustainability of wolves in southeast Alaska. Many more data are needed on wolf population structure, genetic structure, and predator-prey relations to fully address these issues and the overall question of viability. The Alexander Archipelago wolf exists in small numbers in a rapidly changing insular environment. Projected growth in human population, increasing road access, and the continuing loss and fragmentation of high-quality deer habitat will increase the risk of not maintaining a viable, well-distributed population of wolves in southeast Alaska. The area of most immediate concern is game management unit 2, including Prince of Wales and Kosciusko Islands.

Management actions that address risks to wolf populations include modifying hunting and trapping regulations as necessary, limiting construction of new roads and effectively closing some existing ones, and modifying timber harvest strategies to minimize fragmentation and loss of critical deer winter range. Habitat to support a minimum density of 5 deer per square kilometer (13 deer/mi[sup2]), where deer are the primary prey for wolves, would provide for current levels of deer harvest by hunters, trappers, and wolves. In areas less productive for deer, maintaining current densities of deer is particularly important. Setting aside contiguous blocks of habitat within each biogeographic province that are large enough to encompass at least one wolf pack core home range (200 square kilometers [76 mi[sup2]]) would markedly increase the likely persistence of wolves, especially if the reserves contain high-quality deer habitat sufficient to support an average density of deer equal to 7 deer per square kilometer (18 deer/mi[sup2]). The objective of maintaining undisturbed blocks of habitat within each biogeographic province is to assure the persistence of several wolf packs that will serve as source populations capable of replacing wolves that periodically disappear from adjacent disturbed lands.

PURPOSE AND NEED

In 1990, wolves in southeast Alaska were identified by a USDA Forest Service-sponsored interagency committee as a species for which there may be concerns about viability or distribution as a result of extensive timber harvesting in the Tongass National Forest. In December 1993, the Biodiversity Legal Foundation (Boulder, CO) and an independent biologist from Haines, AK, filed a petition with the U.S. Fish and Wildlife Service (FWS) requesting that wolves in southeast Alaska be listed as a threatened subspecies pursuant to the Endangered Species Act of 1973, as amended. The FWS ruled that listing was not warranted at this time, but added: "However, it is clear by our analysis that without significant changes to the existing Tongass Land Management Plan, the long-term viability of the Alexander Archipelago wolf is seriously imperiled." Following that notice, this

assessment was prepared under the auspices of the memorandum of understanding among the Forest Service, Alaska Department of Fish and Game, and the Fish and Wildlife Service. They, along with the Regional Forester, Alaska Region, requested that a conservation assessment be prepared to summarize available scientific information on the status and ecology of wolves in southeast Alaska, and to identify issues regarding their long-term viability and distribution.

This conservation assessment was chartered under the Tongass [National Forest] Land Management Plan revision and the interagency memorandum of understanding (MOU) among the Alaska Region of the Forest Service, the Alaska Region of the U.S. Fish and Wildlife Service, and the Alaska Department of Fish and Game to conserve species tending toward listing. Our report summarizes the most current information available on the taxonomy, genetics, distribution, ecology, and population dynamics of wolves in southeast Alaska. Much of the information has not been published. In particular, we have drawn heavily from ongoing studies on wolves in southeast Alaska that is cosponsored by the USDA Forest Service, the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, and the University of Alaska, Fairbanks. Results from that work are preliminary."

In 2015, that Alaska Department of Fish and Game estimated the Alexander Archipelago wolf on Prince of Wales Island to be 89 wolves during the fall of 2014, down from 221 the previous year.

I support protecting the habitat of the Alexander Archipelago wolf and protecting the habitat of Sitka blacktail deer, that rely on intact old-growth forests in Southeast Alaska.

I write in support of Alternative 1, the No-Action Alternative for the Draft Environmental Impact Statement on the Proposed Alaska Roadless Rule so that we may protect the habitat of the Alexander Archipelago wolf and Sitka black-tail deer on the Tongass National Forest.

I do not agree with the rollback of the 2016 Tongass Plan Amendment to ramp up old-growth clear-cutting in our forests.

It is a terrible idea to repeal the roadless rule in Alaska. This would put intact stands of important old-growth habitat at risk of clear-cutting, threaten crucial salmon and wildlife habitat, especially effecting Sitka black-tailed deer and Alexander Archipelago wolves and burden taxpayers with the cost of roadbuilding in these areas.

I do not think the government should be required to buy back degraded lands from corporations that clear-cut the forest.

I do not think the Forest Service should be required to trade gravel and rock beneath clear cut land for pristine forests with high value timber.

I do not think there should be a bypass of the normal process of appraisal that would result in a major loss for taxpayers and the American public.

I do not want thousands of acres of Tongass National Forest privatized.

The timber industry in southeast Alaska is dwarfed by the fishing and tourism industry, sectors that thrive largely because of their reliance on old-growth forests that produce clean water to provide spawning habitat for salmon and provide natural amenities for visitors from around the world.

Tongass National Forest reminds us that one living thing is never seperate from all living things.

Salmon are a miracle animal. Their bodies fertilize the rivers for future generations. Salmon bring marine nutrients from 1000-2000 miles away. Salmon carried into the forest by bears and eagles provide nutrients to the soil. These nutrients are drawn into trees. These forests, are grown, in part, with salmon meat.

Forests play an important function in the lifecycle of salmon. Trees shade the spawning streams keeping water temperatures cool, keeping redd's cool. Trees prevent erosion from fowling clear water and gravel beds. Trees fallen over streams create protected pools for juvenile fish and provide food for insects they eat.

Temperate rainforest has more biomass than any other Earth biome.

According to the USDA briefing paper Addressing Climate Change on the Tongass National Forest "The coastal temperate rainforest in southeast Alaska currently sequesters and stores large quantities of carbon. As a result, southeast Alaska plays a large and important role in global climate and carbon storage.

...the Tongass supports about 8% of the carbon storage of all forests in the lower 48.

The good news for SE Alaska and temperate rainforests in general is the relative stability of coastal rainforest biomes. The climate niche of most of the dominant tree species is particularly resistant to expected change in climate in the region over the next 30 to 50 years."

"By seeking to weaken the Roadless Rule's protections, the Forest Service is prioritizing one forest use - harmful logging - over mitigating climate change, protecting wildlife habitat, offering unmatched sight-seeing and recreation opportunities found only in southeast Alaska," said John Hicks of the Wilderness Society in a statement.

Joel Jackson is President of the Organized Village of Kake, a remote village that depends on the wild food the Tongass provides. Historically large scale logging has damaged salmon streams.

The Sitka Fish and Game Advisory Committee has just released a paper addressing where the local Southeast Alaska Community stands on the issue of Inventoried Roadless areas on the Tongass National Forest.

Resolution No. 2019-2

A Resolution in support of the 2001 Roadless Rule/In Support of Alternative 1 in the Alaska Roadless Rule-Making Process

WHEREAS, the local Advisory Committees were established to promote and protect the common interest of Alaska's fishery and wildlife resources, which is a vital component of Alaska's social, economic and ecological well-being.

WHEREAS, the Sitka Advisory Committee represents the voices of fish and wildlife users based in Sitka and is made up of representatives from the following stakeholder groups: hand trollers, subsistence resource users, hunting, seining, longliners, power trollers, conservation, trapping, charter guides, resident sport fisherman, processors, hunting guides and shellfish fisherman.

WHEREAS, the inventoried Roadless areas on the Tongass National Forest conserve natural diversity, serve as a bulwark against the threat of invasive species, protect healthy watersheds, provide climate change resilience, and help ensure the continued production of native species of fish and wildlife that rural communities and tribal citizens rely on for economic livelihood and cultural identity.

WHEREAS, the Southeast Alaska community benefit greatly from fish and wildlife populations that are supported

by the Inventoried Roadless areas on the Tongass National Forest.

WHEREAS, Southeast Alaska residents obtain their livelihoods from economic activities including tourism and commercial fishing, which are highly dependant on a pristine and productive natural setting.

WHEREAS, Middle Kruzof Island, Chichagof Island lands bordering Hoonah Sound, Poison Cove, and Ushk Bay, Salmon Lake, Kizuchia Creek, Nakwasina Sound, Fish Bay, Lake Eva and Hanus Bay would all lose their Roadless protections under the proposed full exemption alternative.

WHEREAS, salmon and other marine resource populations are facing increased challenges from changing ocean conditions, climate change, ocean acidification, rising water temperatures in streams and ocean warming events, in the Pacific Ocean, and freshwater habitat development in the contiguous United States

WHEREAS, the Sitka blacktail deer populations are an important subsistence resource for community members that depend on intact old-growth forests and large canopy they support for winter habitat.

WHEREAS, inventoried Roadless areas support healthy fish and wildlife habitat and protect some of Southeast Alaska's highly productive streams and original intact forest areas that were not logged by the pulp mills.

WHEREAS, Roadless areas on the Tongass are essential to Southeast Alaska's way of life and 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 reaction opportunities and opportunities for businesses.

WHEREAS, the amount of carbon stored in the intact old-growth forests and soils of the Tongass National Forest represent one of the highest carbon stores in the world, and conservation of the intact Roadless areas and old-growth forests on the Tongass are essential for maintaining local and national climate resiliance and slowing down climate change throughout the world.

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.

WHEREAS, increased logging of old-growth forests in the existing Roadless area of the Tongass would seriously

impact the ability of the forest to provide these vital ecosystem services, such as clean water, clean air, stream temperature regulation, and healthy salmon and wildlife habitat.

WHEREAS, the commercial fishing industries and visitor industries provide economic backbone of Southeast Alaska and depend on pristine, scenic vistas and healthy, productive watersheds.

WHEREAS, opening up Roadless areas for future development industrial scale logging will actively work against the Tongass transition and the 2016 Tongass Land Management Plan Amendment, which was created after years of collaborative work between a diverse group of stakeholders.

WHEREAS, during the scoping process for the Alaska Specific Roadless Rulemaking process that was initiated by the Secretary of Agriculture in August 2018, communities throughout Southeast Alaska spoke out in strong support of the 2001 Roadless Rule, along with over 90% of the official scoping comments received strongly in support of maintaining the Roadless Rule on the Tongass National Forest.

WHEREAS, the State of Alaska invested time, staff and money to convene a stakeholder-led Citizen Advisory Committee in 2018 that provided recommendations and perspectives from different interest groups in Southeast Alaska in what a workable compromise for an Alaska Roadless Rule could look like.

WHEREAS, the proposed alternative of the Forest Service for a full exemption from the 2001 Roadless Rule goes contrary to public opinion, the recomendations put forward by the Citizen Advisory Committee, the input by tribal governments and the input from local commercial fisherman and guides.

WHEREAS, the draft environmental impact statement does not sufficiently analyze the potential impacts to fish and wildlife populations or reductions in carbon sequestration and increased occurance of climate change driven events that would result from increased ground disturbance activities that would become possible following a full exemption from the 2001 Roadless Rule.

THEREFORE, BE IT RESOLVED, given the longlasting, fiscally irresponsible, and environmentally damaging impacts of any reduction in current Roadless Rule protections on the Tongass the Sitka Fish and Game Advisory Committee strongly supports lasting protection for all Inventoried Roadless areas on the Tongass National Forest as provided for in the 2001 Roadless Rule.

THEREFORE, BE IT FURTHER RESOLVED, the economic livelihoods and subsistence harvesting of Sitka and Southeast Alaska residents would be irreplaceably harmed by the effects of a full exemption from the Roadless

Rule on the Tongass, which would lead to increased climate change, increased threats to fish habitat, and development occurring in pristine natural areas that contribute to the tourism potential and natural beauty of the Tongass National Forest.

THEREFORE, BE IT FURTHER RESOLVED, the Sitka Fish and Game Advisory Committee encourages the USFS to invest in programs, workforce development and employment opportunities for Southeast Alaska residents to restore the health and productivity of the Tongass National Forest's degraded watersheds and streams as a means of supporting vital ecosystem services and economic opportunities such as carbon sequestration, small-scale selective timber harvest, fish and wildlife populations, natural vistas, visited amenities, subsistence, hydrological resources and more.

THEREFORE, BE IT FINALLY RESOLVED, the Sitka Fish and Game Advisory Committee asks that the Forest Service and Secretary of Agriculture adopt Alternative 1 - the NO ACTION ALTERNATIVE - and keep the 2001 Roadless Rule in place on the Tongass National Forest.

For these reasons stated by the Sitka Fish and Game Advisory Committee, I support the adoption of Alternative 1 - the NO ACTION ALTERNATIVE - keep the 2001 Roadless Rule in place on the Tongass National Forest.

"In the mid-20th century, the federal government provided massive subsidies for logging in the Tongass in an attempt to advance economic development in Southeast Alaska. This approach was in line with the focus on timber production that guided USFS practices at the time. The federal government signed 50-year contracts with two companies to harvest 13.5 billion board feet of timber for pulp. The equivalent of logging as many as 1.7 million acres, these sales led to investments in two large processing facilities in the region. However, the low fees that the USDA collected from the timber companies for these projects meant that public spending to prepare these harvests far exceeded revenues, even as thousands of acres of old-growth forests were clear-cut." States the Center for American Progress.

"Decades of logging had not generated significant local employment to justify the disturbances that were being made to the forest. The two large contracts were ended in the mid-1990's, followed by closures of the two mills they had supplied. At the same time the health of the regional economy became increasingly dependant on commercial fishing and tourism, drawn to the region by cruises, sport fishing, and other outdoor recreation opportunities that rely on a natural, undisturbed Tongass."

"Records obtained by Taxpayers for Common Sense reveal that while the federal government spent an average of $23.1 million annually between fiscal years 2009 and 2013 to manage timber sales, the USDA timber program in the Tongass ran an average annual net loss of $21.75 million and never lost less than $15 million in any year due to the low USDA fees and poor timber sales."

"This stretch of continuous losses reflects the dedication to logging by the state and timber industry. Which has persisted despite clear economic realities. For decades, high harvesting costs and low timber prices have meant that the Tongass acts as a so-called last in, first out supplier for wood products markets in the western United States, providing material only when market demand is very high. This lack of consistency means that the USDA cannot sell enough timber to meet it's production goals-despite federal subsidies - and runs counter to the argument that the USFS' focus on timber is a reasonable approach to the region's economic needs."

"In 2016, the USFS released an updated Land Management Plan for the Tongass National Forest, which formalized a management trajectory to complete the transition from old-growth logging to the more economically viable aspects of the local economy. Although the plan includes important conservation measures for salmon streams as well as other provisions to support fishing and tourism, since being finalized, it has been in the crosshairs of Alaska's congressional delegation, which has introduced legislation to repeal the plan on multiple occasions."

"The USFS' has continued to prepare old-growth timber sales. Most recently, it has attempted sales for old-growth timber on Kuiu Island on multiple occasions but this far received no bids. The timber sales on Kuiu that contains one of the most important watersheds for salmon production in the Tongass. Despite the fact that the sale is only estimated to generate $200,000, the agency is planning the construction of a $3.1 million road to access the site. In addition, the USFS' has already granted a waiver to allow timber logged on Kuiu to be exported to mills overseas for processing immediately following harvest."

"This waiver applies to rules meant to support U.S. timber jobs. These rules are in place for every national forest but are often waived for timber sales in the Tongass to attract logging companies. Timber logged in the Tongass won't sell without the waiver, because high costs of harvest and low market demand make it unprofitable to harvest and process the timber within the United States."

"Moreover, exporting timber creates only limited local jobs through logging, while the added employment created by mills is largely developed outside the United States."

"The Tongass has relativy low levels of watershed degradation compared with other parts of the country. Investment in forest and stream restoration would greatly benefit the fisheries that rely on forest health and in turn, support the regional economy."

"Salmon species compromise half the earning of a seafood industry that generates nearly $1billion in annual economic activity for the region; subsidizing logging and construction efforts that would threaten these species is not a sound investment."

"Despite commiting to an increase in finding for stream restoration in previously logged areas and where logging roads abut or cross salmon streams the USFS' has yet to follow through on this $100 million backlog of projects."

"Recreation and tourism should also receive greater investment and support. The Tongass and Southeast Alaska more generally, play a key role in the health of the state's tourism industry, as Cruise lines bring visitors to fish, hike and explore the region's natural and cultural history. Investments, including cabins, trails, and facilities for cruises, would have a much greater impact than logging."

"From 2008 through 2013, the Forest Service spent $139.1 million for timber sales in the Tongass that brought returns of only $8.6 million. In short, taxpayers are losing 93 cents for every dollar spent selling ancient Tongass trees."

According to the Alaska Wilderness League, "Alaska state officials and the Alaska congressional delegation have attempted to force on Southeast Alaska communities and the region's economies something they do not want or need: a revival of large-scale clear-cutting."

"Nearly two and a half years ago, the U.S. Forest Service finalized an updated a management plan for America's largest national forest, the Tongass in Southeast Alaska."

"This plan recognized the importance of conservation in the Tongass by identifying high-value salmon watersheds, inventoried Roadless areas and other conservation lands where logging should not occur."

"It is an important step forward in transitioning the Tongass away from decades of taxpayer-subsidized industrial old-growth logging; a transition that had already begun organiclly as billion-dollar sustainable industries like fishing and tourism have developed."

"Alaska state officials and Alaska congressional delegation have attempted to force on local communities and the region's economies something they don't want or need: a revival of large-scale clear-cutting and an attempt to ressurect an industry that supports less than 1 percent of the region's economy."

"An exemption of the 2001 federal Roadless Rule puts Tongass old-growth at risk."

"The legislature and USFS' have ignored the recommendations of the people they represent, including Tongass Advisory Committee (TAC), which helped guide the Forest Service as it finalized its revamped management plan and was made up of local representatives including goverment, timber industry, Alaska Natives, conservationists and others."

"They have chosen to ignore the more than 165,000 people that commented on that plan, many of whom urged the Forest Service to pursue a faster end to large-scale old-growth logging, and the more than 1.5 million people who voiced support for strong Roadless area protections during the original roadless Rulemaking process."

"Recently, the Roadless Area Conservation Act has been introduced in both the House and Senate."

"The Roadless Area Conservation Act would codify the Roadless rule into law, preserving Roadless areas across the country for hunting and fishing - activities that support a subsistence lifestyle and define a way of life for many people living in rural forested areas. It would help fight climate change impacts"

According to the United States Forest Service, "...the Tongass supports nearly 8 percent of the carbon storage of all forests in the lower 48."

The Alaska Wilderness League states, "The Roadless Area Conservation Act would protect species that rely upon Roadless areas for survival and preserving that what Native American and Alaska Native communities consider sacred."

"The Roadless Area Conservation Act will support outdoor recreation and tourism industries that thrive when forests are valued for their many ecological benefits."

"In Alaska, the Roadless rule protects Tongass old-growth while also providing for community access, hydropower projects, utility connectors and other economic development projects when they see a legitimate public interest."

"The state's request to create a state-specific rule in the name of meaningfully addressing local economic and development concerns was never anything more than a pretext for continuing to prop up an old-growth timber industry that can not survive on its own."

"Keeping the Roadless rule in place will continue to help strengthen Southeast Alaska's economy while maintaining the health of our forests and the communities and wildlife that depend on them."

"Old-growth forests and intact Roadless areas are the last vestiges of America's truly wild places."

"We should embrace the value of our national forests, which in Southeast Alaska extends far beyond the leveling of forestland and exporting old-growth logs to other countries."

"We should be Preserving these trees and expanding our forests as a bulwark against climate change. We should not be gutting policies essential in the climate change fight."

"If Congress will look long term, keeping the Roadless rule in place will help maintain the health of our forests and the communities and wildlife that depend on them."

Because of these points made by Alaska Wilderness League, I write in support of Alternative 1, the No-Action Alternative to keep the Roadless Rule in place on Tongass National Forest.

Headwaters Economist published a report December 2014, The Tongass Transition Framework: A New Path Forward?

Headwater Economics worked with Ross Gorte, pH.D., to produce the report. Gorte, a retired Senior Policy Analyst at the Congressional Research Service, is now an Affiliate Research Professor at the University of New Hampshire.

"The Tongass National Forest has made no meaningful shift in its budget and staff allocations since announcing the Transition Framework in 2010."

"The Tongass National Forest continues to invest disproportionately (34-45% of its budget) in a timber industry that provides relatively few jobs (1% private employment) while neglecting more economically important industries to the region such as tourism and fishing (24%)."

"The Tongass National Forest remains predominantly focused on old-growth harvests (87% of proposed sales) at a significant cost to U.S.taxpayers (more than $100 million)."

"In 2010 the Forest Service announced a new direction for the Tongass National Forest. Called the "Transition Framework," the Forest Service proposed a "New path forward in the region that enhances economic opportunities to communities while conserving the Tongass National Forest.""

"Four years since this commitment, it is fair to ask if a transition is in fact occurring, and whether it is improving economic opportunities for communities in southeast Alaska. To understand if change is taking place, this report examines the Tongass National Forest budget and staffing, as well as the economy of Southeast Alaska and proposed timber sales."

"Tongass National Forest has failed to shift resources from Timber Program"

"The Tongass National Forest budget and staffing were examined in detail because they provide an indicator of agency priorities. Forest Service spending on timber continues to account for the largest portion of the Tongass National Forest budget - roughly 34 to 45 percent of the budget. Since the transition was announced, expenditures on timber production show no particular trend, though timber's share of the overall budget has increased. Despite overall staff cuts on the Tongass National Forest from FY2011 to FY2013, timber FTEs have largely held steady."

"Recreation budget expenditures fell during the analysis period, though they were partially offset by increases in recreation receipts. In 2014 the Tongass National Forest announced it's intention to enact future budget cuts in the recreation programs-despite growing public demand for recreation activities on Forest Service lands. From FY2011 to FY2013, recreation staff declined more than any other major program on the Tongass National Forest, falling from 60 to 47 FTEs."

"Tourism and Fishing, Rather Than Timber, Drive Southeast Alaska Economy"

"The Southeast Alaska Economy is no longer driven by the timber industry, which has steadily declined as a share of all private sector jobs. From 1998 to 2012, according to the U.S. Department of Commerce, regional timber jobs declined by more than 80 percent (-982 jobs), while all other private sector jobs grew by nearly seven percent (+1,384 jobs)."

"In addition to a declining number of jobs, economic data from all sources indicate that timber industry

employment in Southeast Alaska today is small proportion of the regional economy. According to the U.S. Department of Commerce, regional timber industry jobs accounted for 1.1 percent of total private employment in 2012. An additional 41 self-employed individuals worked in the timber industry in 2012, or 0.5 percent of all self-employed people in the region - for a combined 0.9 percent of all private jobs and self-employed in Southeast Alaska."

"By comparison, the two largest private sectors in the region's economy - the tourism and fishing industries - are growing. Southeast Conference reports that in 2013:"

"-the Southeast Alaska visitor industry employed 6,707 people, is growing (+332 jobs, 5.2% change from 2012 to 2013), and accounted for 15 percent of total regional employment."

"-the Southeast Alaska seafood industry employed 4,252 people, is growing (+148 jobs, 3.6% change from 2012 to 2013), and accounted for nine percent of total regional employment."

"The tourism and fishing industries both rely on land and water resources managed by the Tongass National Forest and directly benefit from enhancements to natural resource health, along with services and infrastructure provided by the Forest Service. Activities that degrade the pristine nature of the land, such as old growth harvesting, are likely to have adverse impacts on these important regional industries."

"Narrow Focus on Old-Growth Timber Sales with Subsidies Persists"

"Since the Transition Framework announcement, 87 percent of timber sales proposed by the Tongass National Forest have been old-growth by volume. Timber sales have consistently cost much more to prepare, access, and administer than the federal government received for the timber. The net loss to the U.S. taxpayer has ranged from $489 to $1,132 per thousand board feet - or more than $100 million - during these years."

"Earlier this year, the Forest Service awarded a 97-million board foot timber sale contract as part of the Big Thorne Project that was reportedly worth more than $6 million. But at the FY2013 average Tongass National Forest cost of $595 per MBF, the preparation and administration costs of the sale would be more than $57 million, with a net cost to the U.S. Treasury of $50 million - a nearly 10:1 expense-revenue loss ratio."

"The allocation of scarce Tongass National Forest budget and staff resources to a minor economic sector represents a large opportunity cost for the regional economy: these resources could be repurposed, using the logic of the Transition Framework, to larger and more vibrant industries that support more jobs and communities

in Southeast Alaska. The casualties of this failure to seize a more promising economic trajectory are Southeast Alaska's business and communities, as well as the U.S. taxpayer."

Tongass National Forest, needs to be protected. We need to protect these salmon forests so that they can continue to produce salmon and support all their wildlife.

As part of the world's largest temperate rainforest, the Tongass serves it's most vital role as a storage unit for carbon. The climate is in crisis and clear-cutting old-growth timber in the Tongass National Forest will not help this planetwide situation.

I write in support of Alternative 1, the No-Action Alternative for the Draft Environmental Impact Statement on the Proposed Alaska Roadless Rule.

[POSITION]