

Data Submitted (UTC 11): 12/17/2019 9:00:00 AM

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Comments: I am an Alaska resident, originally from Prince of Wales Island. I have personal and professional experience with the impacts of logging and logging roads on the environment and communities of southeast Alaska. The long-term environmental integrity and economic health of southeast Alaska is dependent on healthy forests, rivers, and oceans. I strongly oppose the plan to exempt the Tongass from Roadless Rule protections.

The Tongass is worth more as an intact temperate rainforest than it could ever be worth as harvested timber. The healthy, functioning coastal rainforest is a globally significant refuge that supports bears, wolves, deer, birds, salmon, and other fish and wildlife. Furthermore, the Tongass is the largest carbon sink of all of the national forests in the United States. Protecting the Tongass is essential to combating the global threat of climate change, which is already having profound impacts on Alaska. At a regional level, a healthy, intact, Tongass supports fisheries, tourism, recreation, subsistence and all of the economic and cultural values of those activities.

Commercial salmon fishing is the backbone of local economies in Southeast Alaska. Subsistence salmon fishing is critically important for local communities and has invaluable cultural importance for Alaska Native Tribes. In addition, sport fishing for salmon draws tourists and local participants. Fishing is an economic and cultural driver that relies on intact watersheds that support healthy salmon populations. The Tongass supports salmon runs that produce approximately 80% of the salmon that is caught in the southeast Alaska region. The detrimental impacts of logging and logging roads on salmon spawning habitat have been well documented, including in reports from the US Forest Service and the Alaska Department of Fish and Game and published scientific literature (see for example, Johnson et al. 1986, Heifetz et al. 1986., Cederholm and Reid 1987, and Hicks 2002). Timber harvest has direct and indirect effects on salmon, almost all of which are detrimental to the fish and their habitat, and result in reduced spawning and reduced survival. Roads and logging increase erosion, runoff, and landslides. Erosion causes bed fining, which increased fine sediment loading in spawning streams and reduces salmon egg survival (Jensen et al. 2009). It also causes aggradation, which fills in rearing pools with coarser sediments, and turbidity in salmon feeding habitat, both of which reduce juvenile survival. Changes in the hydrologic cycles due to increased or altered runoff have been shown to dramatically reduce survival of salmon embryos in gravel.

The impacts of logging and logging roads on salmon are a primary concern because of the value of the fishery to local communities and the State of Alaska. However, timber harvesting has ecosystem-wide impacts that go far beyond salmon. The remaining old-growth in the Tongass provides critical habitat for many species of fish and wildlife. The USFS has estimated that the Tongass holds 10-12% of the carbon that is stored in national forests. Preserving mature forests plays a vital role in removing carbon dioxide from the atmosphere. The Tongass supports many recreational activities that are important for local people and tourism, including hunting, fishing, hiking, and sightseeing, all of which are impacted by road development and logging. Tourism, in particular, is another current driver of the southeast Alaska economy, and relies on natural beauty and functioning ecosystems.

Logging in the Tongass is only profitable when heavily subsidized by taxpayers at an enormous net loss. In fact, an

estimated \$600 million federal dollars have been lost to logging in the Tongass in the past twenty years. Having grown up in a logging camp in southeast Alaska, I am well aware of the local jobs and economic value that logging creates. However, the long-term resilience of southeast Alaska, the United States, and the planet is dependent on healthy forests, and this outweighs shortsighted economic gains. The Tongass is public land and should be managed for its global, regional, and local ecological value, as well as its contribution to current, long-term, and sustainable economic drivers in southeast Alaska.

For all of these reasons, I oppose the state-specific roadless rule that would exempt the Tongass from the protections that have been in place since 2001 and support the no action alternative in the current proposal.

Citations:

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Heifetz, J., et al. (1986). Effects of Logging on Winter Habitat of Juvenile Salmonids in Alaskan Streams. *North American Journal of Fisheries Management* 6(1): 52-58.

Hicks, B. J. (2002). Gravel galore: Impacts of clear-cut logging on salmon and their habitats. In B. Harvey and M. MacDuffee (Eds.), *Ghost runs: The future of wild salmon on north and central coasts of British Columbia* (pp. 97-118). Victoria, British Columbia: Raincoast Conservation Society.

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Johnson, S. W., et al. (1986). Effects of Logging on the Abundance and Seasonal Distribution of Juvenile Steelhead in Some Southeastern Alaska Streams. *North American Journal of Fisheries Management* 6(4): 532-537.

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