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Comments: Tongass and Chugach National Forests Roadless Rules

I stand with The Eyak Preservation Council (EPC). EPC opposes the proposed exemption of the Tongass National Forest from the 2001 Roadless Rule, and also opposes possible modifications to the Chugach National Forest Inventoried Roadless Area boundaries. We request that Secretary of Agriculture Perdue select Alternative 1 instead of the preferred Alternative 6.

The correct decision is to protect the two largest national forests in our country. Preserve the health of our wild salmon by leaving the Roadless Rule fully intact. A loosening of the Roadless Rule would bring harm to the fisheries, economies, and valuable, living cultures throughout Southeastern and Southcentral Alaska. The proposed exemption would negatively impact lands of Eyak, Tlingit, Haida, Tsimshian, Athabaskan, Aleut, Alutiiq, and Chugach Peoples.

EPC is in solidarity with the six federally recognized tribes in Southeast who have participated in the 2019 Roadless Rulemaking effort. These federally recognized tribes must be treated as sovereign nations in all federal processes. The leaders of the six participating tribal governments all expressed concern about subsistence uses being compromised by the exemption of the Roadless Rule, and all stated their opposition to Alternative 6. Their firm objections to Alternative 6 must be acknowledged.

As Richard Peterson, president of the Central Council of Tlingit and Haida Indian Tribes, points out: "Any elected official in Alaska who supports a full exemption, is disregarding their constituents, undermining the public process, and ignoring the sovereign Tribal governments - whose people have lived and depended on these lands and waters since time immemorial."

There are convincing economic and ecological reasons to leave the Roadless Rule in place. Economically, the removal of the Tongass from the Roadless Rule protections would be unwise in light of our state's reliance on fisheries. Secretary Perdue must look at how much revenue Alaskan fisheries bring in compared to the logging industry. There are currently a mere 61 logging jobs in Southeast Alaska; meanwhile, tourism and fishing make up 26 percent of jobs in the region, says Austin Williams, law and policy director at Trout Unlimited.

Our state and federal agencies spend about \$30 million each year on road construction and planning for timber sales. However, timber sales only bring in about \$1.5 million per year, Williams says. Trying to resurrect the logging industry is a losing financial proposition.

At the latest Anchorage meeting on the Roadless Rule, a Juneau resident highlighted that, "approximately 90 percent of the 144,000 public comments submitted during the scoping period indicated preference for keeping the Roadless Rule in place." Additionally, in the over decade-long collaborative planning for the latest Tongass Forest Plan, the top goal agreed upon by the majority of stakeholders, was to phase out old-growth logging within 15 years.

However, the secretary's preferred Alternative 6 would do the opposite. Alternative 6 "would give the timber industry the opportunity to harvest some of the last remaining, really large (4-10-foot diameter) old-growth trees in the Tongass", in the words of a retired forester that worked in the Tongass for decades.

"An additional 166,000 acres of old-growth forest would be classified as harvestable[hellip] It takes about 300 years for those trees to develop old-growth characteristics," which benefit the entire system, including salmon.

The inclusion of the Chugach National Forest in the proposed revision of the current Roadless Rule would amplify the devastating harm to fisheries and the financial health of Southeastern and Southcentral Alaska. Not only does the Chugach National Forest host a magnificent Wilderness Study Area, it also safeguards waterways that support some of the largest fisheries in Alaska: The Copper River Delta and Prince William Sound.

We are extremely concerned about how additional logging would threaten waterways and fish. Scientific studies indicate that "the Tongass and Chugach National Forests, with a land area less than 100,000 square kilometers, contributed an estimated 25 percent of the state's commercial Pacific salmon harvest[hellip] From 2007 to 2016 these national forests contributed an average of 48 million Pacific salmon annually to commercial fisheries, with a dockside value averaging \$88 million (inflation adjusted to the base year 2017)." These statistics prove that intact forests play a vital role in preserving healthy fisheries.

Scientists have traced the impacts of clear-cutting on downstream ecosystems. Researchers point out that logging activities can devastate freshwater spawning and rearing habitat. We will never agree to risk the dynamic salmon forest ecosystems of Southeast and Southcentral Alaska, the majority of which remain pristine and impressively productive.

In summary, the Eyak Preservation Council is opposed to the proposed Roadless Rule changes for cultural, economic, and ecological reasons. We are demanding that the Tongass and the Chugach National Forests be left fully protected by the Roadless Rule.

Sincerely,

Carol Goldberg

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