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The Honorable Sonny Perdue

U.S. Department of Agriculture

1400 Independence Ave., S.W.

Washington, D.C. 20250

Ms. Vicki Christiansen

U.S. Forest Service

1400 Independence Ave., S.W.

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Dear Secretary Perdue and Chief Christiansen,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Alternatives to a Proposed Alaska Roadless Rule. I recommend Alternative 1 - the No Action Alternative. I make this recommendation as a wildlife professional. I worked on brown bears and goshawks on the Tongass and led various cooperative efforts for over 20 years involving forest and wildlife management. This began with assisting the USDA Forest Service in the crafting of the Conservation Strategy and various standards and guidelines for the 1997 plan.

I find the overall analysis be poorly analyzed from a wildlife and forest science perspective. The analysis is far to qualitative. The EIS is replete with many, many statistics, but they fail to analyze the impacts of the preferred alternative at a meaningful ecological scale that is relevant to old-growth dependent and old-growth associated wildlife. The present qualitative analysis is a marked regression from the 1997 forest plan and subsequent revisions.

I am concerned about the portrayal of the Old-growth Conservation Strategy. The DEIS states "The Old-growth

Habitat Conservation Strategy was developed to maintain the integrity of the old-growth forest ecosystem, and thereby conserve biological diversity across the Forest by retaining intact, largely undisturbed habitat. In addition, because of its predominantly undeveloped nature, a number of wide-ranging species find optimal habitat in the more remote areas of the Forest." I worked on the Conservation Strategy and I believe it was designed to maintain viable and well-distributed habitats for certain wildlife species (e.g., wolf, northern goshawk, brown bear, flying squirrel) and reduce the probability of an Endangered Species Act positive finding. It had that desired outcome. The viable and well distributed information is mentioned on page 3-71, but not in the Key Findings of the DEIS, leading to confusion and lack of scientific and objective clarity. Statements used in the DEIS such as "optimal habitat" (Key Issue 3) are virtually impossible to measure with the wildlife data quality on the Tongass and as such they nonsensical in the wildlife profession and not science based.

Key Issue 3 states - "Because long-term POG harvest and road densities are not expected to differ significantly among alternatives, effects on old-growth-dependent wildlife species are expected to be almost identical to those predicted under the 2016 Forest Plan FEIS." It is unclear how this is true at the scale of areas like north and central Prince of Wales Island where much of the old-growth habitat has been lost and there is a sea of second growth. This DEIS needs to have some specific analyses (i.e., use the science approach of the Pacific Northwest Research Station from the 1997 Tongass plan and the various approaches for spotted owls) for key areas that will be subject to roadbuilding. These watersheds and landscapes are easily identifiable. Additional road building and timber harvest in certain places may have profound impacts on wolves, goshawks, brown bears, flying squirrels and other old-growth associated species. Some of these species may be near the tipping point in landscapes that have already been highly affected by previous timber harvest.

The DEIS has no such species-specific analyses, yet there are science-based tools that could help inform how eliminating roadless protection in some landscapes/watersheds might impact certain local wildlife population(s). Some might term this a cumulative impact analysis, which is missing. The configuration of these remaining old-growth stands are key for wide ranging species such as northern goshawks on some prey poor islands (see 2006 Journal of Wildlife Management Vol. 70, pages 1151-1160) that depend on old growth and very seldom use second growth. The DEIS really needs some landscape specific analyses rather than just stating that the effects would be minimal. For example, the qualitative analysis on page 3-93 for goshawks suggests that the impacts would be greatest in areas such as north central Prince of Wales Island. This is speculation with no analysis and no science. The status of goshawks on the Tongass is unknown, especially areas like Prince of Wales Island. This is quite different from other national forests in the West where goshawks continue be monitored.

The DEIS notes that site specific analyses are not considered, because they would be considered later when roadbuilding, timber harvest or other activities are proposed. This seems quite inappropriate as the reader cannot evaluate such a sweeping preferred alternative in the context of the landscape and island archipelago system. A piecemeal approach later in small areas would fail to evaluate cumulative impacts in the context of wildlife, ecosystem services, economic impacts, subsistence use, etc.

Overall, the scientific underpinnings for the impacts of the Proposed Rule are very weak. Science is meant to inform - science does not decide. Unfortunately, the lack of updated science may lead to a less than informed decision. I support the no action alternative to maintain these ecologically important old-growth forests in the context of the current Roadless Rule. The roadless areas - especially adjacent to areas that have had significant roading and timber harvest on the islands (i.e., not roadless icefields) hold some of the last remaining stands of large old-growth. They should be maintained for their subsistence, fisheries, wildlife, recreation, watershed

integrity and intrinsic values.

Thank you for considering my comments.

Sincerely,

Kimberly Titus, Ph.D.

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