

Data Submitted (UTC 11): 12/17/2019 9:00:00 AM  
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Organization:  
Title:  
Comments: Re: Roadless Rule Comments for Tongass

Dear Forest Service:

The roadless rule was enacted to slow down three processes that were happening on National Forests in the 1970s, 1980s, and 1990s:

- 1) More roads were being built than the forest service could maintain, and even roads that had been "put to bed" continued creating erosion making streams less productive for salmon.
- 2) Very little old growth (mixed aged forest with mean d.b.h. of 30" or more) remained in the lower 48 or Southeast Alaska. Old growth provides habitat for a species like Goshawks that can not live/hunt in dense young forests. Old growth has greater species richness.
- 3) Lower 48 residents felt that most wild place had been trammeled and the few places that were left should be preserved without roads or other development.

Admittedly the Tongass has many wild areas so the third reason is less valid on the Tongass than on the lower 48 national forests.

The Tongass still has many roads that are contributing excessive sediment to streams and many culverts that block fish passage. Like National Forests in the lower 48, the Tongass NF logged most of its old growth trees leaving little habitat for the animals that need an open forest structure and large trees. Old growth provides habitat for a much wider array of species than young forests.

Since two of the three reasons for creating the rule are still valid, my preference would be to not change the roadless rule at all.

That said, there is an argument for a little flexibility around native communities. These native communities, which are only connected by ferries, should be allowed more leeway in how the lands immediately around them are managed. I would say the native communities are the ones with Tligit/Haida names: Angoon, Hoonah, Klukwan, Kassan, Klawak, Kake, Hydaburg, Hyder e.t.c . I think a process could be set up so each could get a certain

number of miles of new roads perhaps based on their population.

In public meeting USFS staff suggested Forest Plans, not roads, dictate timber harvest levels; this was disingenuous. Forest plans change about once a decade. Timber gets harvested where it can be economically extracted and moved to a market. Roads make it cheaper (or in some cases possible) to harvest timber so more roads will increase timber harvest in the future.

The Tongass does have "wilderness" areas, but these areas often are in cold, high elevation areas not suited for growing large trees. Some of the Tongass's official Wilderness is glaciated or under permanent snowfields. Most of it has shallow soils on steep slopes with small trees or bogs. This is not the same habitat as what is being protected in the last few acres of "old growth" which are not currently accessible.

My first preference is to leave the Roadless rule 100% intact on the Tongass. If there is too much pressure from Washington for change, a small change, such as alternative 1 that just slightly changed the roadless boundary would be acceptable. It is not acceptable to use this roadless rule change to facilitate logging any of the remaining old growth. Just be patient and wait for the second growth trees to grow and retool mills for smaller trees.

Thank you for considering my comments. Please email me back that these comments have been recorded and considered.

[Position]