

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

First name: Katherine

Last name: Russell

Organization:

Title:

Comments: Leave the Alaska Roadless Rule in place

Dear Comment Period Alaska Roadless Rule,

The Tongass National Forest, the largest national forest in the country, is a temperate rainforest located in southeast Alaska. As the largest remaining temperate rainforest in the world, the Tongass is nearly 17 million acres in size, double the size of Maryland, and is home to vast populations of grizzly bears, bald eagles, wolves, and the lifeblood of the southeast Alaskan economy: salmon (U.S. Forest Service, n.d.).

In January of 2001, President Clinton and his administration issued the Roadless Area Conservation Policy directive to virtually end logging, roadbuilding, mining, and fossil fuel development in the last wild areas of national forests, including the Tongass National Forest ("Timeline of the Roadless Rule," 2015). The U.S. Forest Service adopted the National Roadless Area Conservation Rule (Roadless Rule) in January 2001 to protect "inventoried roadless areas from road construction and reconstruction and certain timber harvest activities" (United States Department of Agriculture, U.S. Forest Service, 2019). These areas provide critical habitat for wildlife and plant species, contribute to healthy watersheds and drinking water, and provide for economic opportunities like commercial fishing, outdoor recreation, and tourism (United States Department of Agriculture, U.S. Forest Service, 2019).

Currently, the Trump Administration along with U.S. Senator from Alaska, Lisa Murkowski, are in the process of attempting to repeal the Roadless Rule in the Tongass to 'repave' the path for timber harvesting. Repealing this rule will devastate the economy of southeast Alaska by harming a critical economic resource: salmon. Southeast Alaska is home to all 5 species of Pacific salmon and supports thriving commercial fishing, recreational fishing, and subsistence fishing industries and lifestyles (U.S. Forest Service, n.d.).

Ironically, the timber industry supports only under 1% of southeast Alaska's jobs, while the seafood industry (fueled by fishing efforts) supports 8% of the region's jobs, and tourism supports 17% percent (Southeast Conference Regional Development Organization, 2018) (Eilperin & Dawsey, 2019). Increased timber harvesting has the negative externality of destroying critical habitat for salmon, who migrate from the ocean up streams in the Tongass to spawn. Old-growth forests, like the Tongass, provide the perfect habitat - cold, clear streams with deep pools and riffles formed by fallen trees and natural curves formed by intricate root systems - for salmon to spawn in and then rear as juveniles before heading out to the ocean for much of their adult life (U.S. National Park Service, 2015).

Logging would destroy this habitat and decimate salmon populations, as the salmon would have limited locations to spawn and rear. This leaves fishermen to bear the huge cost of reduced salmon populations, and the tourism industry (based on ecotourism and sport fishing) to bear the cost of collapsing forest ecosystems that are not as attractive to tourists. This would occur as the logging industry receives all the benefits, without providing the economic benefits that the fishing and tourism industries provide to the region.

On top of all this, the timber industry itself has been shown to be detrimental to the southeast Alaska economy, even with the Roadless Rule in place. A recent report shows that there has been "\$600 million in money-losing timber sales in the Tongass over the past two decades" (Hanna, 2019). Currently, the largest mill in southeast Alaska only has a few dozen employees, and recent timber sales in the Tongass have had no buyers, indicating that there is very little demand for timber from the Tongass and current supplies are already exceeding demands (Jones, 2019) (Resneck, 2019). If more timber industry is developed in the Tongass, it will only lead to further

losses of taxpayer money because supply of timber will be increased with no demand, meaning the timber will have to be sold for a low price if it can be sold at all. Other reports have shown that the U.S. Forest Service, a federal agency under the U.S. Department of Agriculture, has lost over \$1 billion in timber sales from the Tongass since 1982, despite federal government incentives of subsidies from 2008-2017 costing \$20 million annually (Greenspan, 2015) (Jones, 2019). These losses will only continue to mount with decreased demand and increased supply of timber (Greenspan, 2015) (Jones, 2019). In contrast, the Forest Service estimates that the fishing industry brings in \$1 billion annually, with \$986 million of that coming from salmon fisheries that rely on healthy and intact forest ecosystems (Jones, 2019) (Eilperin & Dawsey, 2019).

There is no economic sense for Trump and Murkowski to repeal the Roadless Rule that will allow more logging in the Tongass, when there is such a high opportunity cost: lost salmon habitat resulting in lower salmon catches. Keeping the Roadless Rule in place, or creating even stronger legislation to protect the Tongass, is the best way to ensure a strong economy and prevent devastation of both salmon populations and the economy of southeast Alaska.

I am writing in support of the 'no action' alternative to leave the Roadless Rule unchanged in Alaska.

I am concerned that changes to the rule would lead to greatly expand clear-cut logging of old growth timber and costly road building in undeveloped, wild areas of both the Tongass and Chugach Forests. These activities increase sedimentation, hurt water quality, often block salmon migration, and add to an already large backlog of needed road maintenance and restoration.

Our fisheries and wild forests are critical to the economy of Alaska. To grow these sectors of our economy, we need intact habitat. Please leave the Alaska Roadless Rule in place.

Sincerely,

Katherine Russell

Tempe, AZ 85283

[Position]