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Comments: HC4038

U.S. Forest Service Alaska Roadless Rule Committee:

Road building and lack of road maintenance have created problems in riparian zones that have persisted decades after harvest. Problems include, obstruction of fish movements, alterations in drainage patterns, ponding behind collapsed log culverts, and changes in groundwater flow beneath road prisms. Despite this, there are well over 6,000 km of roads built in SE Alaska. Given the island geography of the region, these roads further fragment habitats for numerous species, creating islands within islands. Roads have been clearly detrimental to our ecosystems. A survey of road conditions on national forest lands, including POW island, indicated that only 34% of culverts and bridges intersecting anadromous fish-bearing streams were adequate for adult and juvenile fish passage, and only 15% were adequate for passage of resident fish.

It is important to recognize that timber has been the most important modifier of North Pacific rainforests. Scientists agree that if logging continues in the locations and at the rates of the recent past that the overall landscape structure will increasingly diverge from historical patterns. This threatens our ecosystems as clear-cutting old growth forests significantly changes forest ecosystems. Younger forests differ strikingly from the original forests they replaced. For example, thicker second growth leads to less ground level vegetation, which leaves deer with little to no food, causing a cascade of impacts throughout the food chain (including humans). Additionally, old growth forest is a crucial piece in carbon sequestration strategies as well as providing multiple canopy layers supporting entire ecosystems that cannot flourish in harvested areas.

The Roadless Rule has been instrumental in conserving the Tongass National Forest and in supporting its fish and wildlife-based industries for almost 20 years. Please uphold the Rule's protections for important fish and wildlife areas, including the Tongass 77. Roadless areas are an important source of food, jobs, and income through commercial, subsistence, and recreational fishing. Salmon are part of Alaska's culture and we must protect them and their spawning streams.

Sincerely,

Nick Ponzetti

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