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First name: Paul

Last name: Robbins

Organization:

Title:

Comments: FW: WWW Mail: Tongass National Forest and Roadless Rule

A message forwarded from the WO webmaster and addressed to Earl regarding Roadless.

Paul Robbins Jr., MPS

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-----Original Message-----

From: Kuharich, Melinda -FS <melinda.kuharich@usda.gov> On Behalf Of FS-Tongass Webmaster

Sent: Thursday, December 3, 2020 8:40 AM

To: Robbins, Paul - FS <paul.robbins@usda.gov>

Subject: FW: WWW Mail: Tongass National Forest and Roadless Rule

-----Original Message-----

From: jchris87@msudenver.edu <jchris87@msudenver.edu>

Sent: Wednesday, December 2, 2020 3:46 PM

To: FS-Tongass Webmaster <SM.FS.TNFWebmaster@usda.gov>

Subject: WWW Mail: Tongass National Forest and Roadless Rule

December 2, 2020

Earl Stewart

Tongass National Forest

648 Mission Street

Ketchikan, AK 99901-6591

RE: Roadless Rule as applied to Tongass National Forest

Mr. Earl Stewart,

I am writing today to express my concern regarding the new Tongass Forest Plan following the USDA decision to exempt Alaska from the 2001 Roadless Rule. As someone raised in the 49th state, I agree that the Roadless Rule was not necessarily suitable for Alaska's untouched lands; however, I find that the final ruling of Alternative 6 (as summarized in the Federal Register (USDA 2020)) is hardly best for our state or, more importantly, our planet.

As a university senior level Biological Sciences major and student of Conservation Biology, it has come to my attention that America is simply not doing enough to preserve biodiversity and untouched ecosystems. One may ask, Why should I care about biodiversity? It is a commonly held scientific notion that every species on this planet plays a part in one another's continued existence. Doctor Paul Ehrlich concisely describes humanity's dependence on the whole of nature as a give and take economy; the Earth's species provide countless ecosystem services - supplying fresh water, filtering the air, pollination, etc - which allow us to continue using resources and thriving as a species. No good can come from lifting protections to 9,368,000 acres of the Tongass in the name of economic growth if we cannot recognize the value of the subsequent loss in ecosystem services.

Forests are major contributors to biodiversity. In the Tongass, one can find the largest population of Bald Eagles in the United States, brown bears, all five species of Pacific salmon, glacial fjords, and numerous watersheds with far-reaching impacts. Combined with its neighbor, Canada's Great Bear Rainforest, this protected region is the largest temperate rainforest on Earth.

Furthermore, the Bald Eagle (*Haliaeetus leucocephalus*), while no longer an endangered species is still protected under the Bald and Golden Eagle Protection Act. It is hypocritical to simultaneously declare this bird as untouchable, while destroying its natural habitats in the Tongass. Birds have been shown to struggle significantly due to forest fragmentation, having to migrate out of their original native habitat and find refuge in nearby forest stands (Sreekar 2015). These stands have already achieved equilibrium with their own Bald Eagle communities; the influx of birds in protected acres may seem promising but will quickly disrupt that equilibrium and negatively affect the isolated ecosystem. This will result in the reduction of our nation's most well-known bird of prey, courtesy of human negligence.

Brown bears (*Ursus arctos*) that inhabit the Tongass forests with also be greatly affected. A risk assessment panel found that undisturbed buffers from human development (meaning no lumber harvesting, no roads, etc), along with salmon-bearing streams, aid in maintaining *U. arctos* habitats by providing space to gather and feed (Titus and Beier 1999).

While prominent Alaskan faunae have populations that are, as of today, relatively stable, loss of their habitat in the Tongass will bring about a reduction in their numbers and a major loss of biodiversity.

I argue that Alternative 2, named in the Federal Register's summary of its decision as the "environmentally preferable alternative; [causing] the least damage to the biological and physical environment," is a far superior and more responsible option for maintaining biodiversity (USDA 2020). While it may seem to offer less protections at first glance, all proposed 32,000 roadless acres are as of yet untouched. The final ruling, on the other hand, does not clearly state which acres will be protected as roadless; how can Alaskans trust that altered lands, already fragmented, won't be included in that acreage?

If a portion of the Tongass must be sacrificed, let's work to make the environmental impact as small as possible while noting both the economic opportunities and ecosystem services needed for future generations to thrive.

Sincerely,

Joseph Christman

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Aurora, CO 80013

Jchris87@msudenver.edu

#### Citation

Forest Service, Agriculture Department (USDA). Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska. Pub. 10/29/2020.

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