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The Honorable Sonny Perdue, Secretary

United States Department of Agriculture

1400 Independence Avenue, SW

Washington, DC 20250

David E. Schmid, Regional Forester

USDA Forest Service, Alaska Region

Attn: Alaska Roadless Rule

P.O. Box 21628

Juneau, Alaska, 99802

Submitted electronically at: <https://www.fs.usda.gov/roadmain/roadless/alaskaroadlessrule>

Attn: Roadless Area Conservation; National Forest System Lands in Alaska

Dear Secretary Perdue and Mr. Schmid:

The Tongass is the country's largest national forest[mdash]and home to nearly one-third of all oldgrowth temperate rainforest remaining in the entire world, and is prime habitat for wolves, specifically the Alexander Archipelago wolf, and their prey, the Sitka black-tailed deer. The Tongass old-growth forests provide ideal nesting habitat for the Queen Charlotte Goshawk, an endemic rainforest raptor that lives in coastal British Columbia and Southeast Alaska. The old-growth trees within Tongass roadless areas provide necessary shade

for salmon streams. Both the Tongass and the Chugach play a vital role in capturing excess carbon from the atmosphere and mitigating some of the impact of global warming, as well as providing ecosystems services that reach beyond Alaska.

The wildlands of these forests are a treasured natural resource that should be valued and protected from the destruction of logging. Changing or repealing the Roadless Rule will lead to nothing but environmental degradation in these vital forest ecosystems. The Tongass has already lost at least half of its old growth forest since the 1950s, due to scorched-earth logging practices that utilized a technique of clear cutting full forest areas. Large areas that were clearcut are slowly growing back into dense thickets of young trees that are nearly impenetrable to wildlife. Old logging roads fall into disrepair, filling salmon streams with erosion and blocking the way for fish.

An "Alaska state-specific" version of the Roadless Rule, would allow for increased resource extraction in the form of roadbuilding and old growth timber logging in the farthest reaches of Alaska, would be a step away from sustainable development, would run counter to the interests of all Americans, and is a rule change that we vehemently oppose. The Roadless Rule was put in place for good reason, and aims to protect sensitive habitats and wild areas, as well as to conserve natural resources in all of our national forests—an obligation that is part of the U.S. Forest Service's mandate to manage public land for multiple uses. Because it reflects a shift from the long history of subsidized logging of the Tongass' old-growth forests and toward a more sustainable management approach that capitalizes on the region's globally unique ecology, the rule has become a contentious issue with the extraction industry and a small minority insisting on exceptions or exemptions in the form of an "Alaska version" of the Roadless Rule, pursuing an antiquated strategy; a subterfuge which is clearly unsustainable, goes against the majority of citizen stakeholders as well as the agency's mission.

Science shows that the clear cutting of old growth trees for timber puts whole systems at risk and destroys wildlife habitats. This timber-centric approach not only disregards scientific research, but also neglects the opportunities that the Tongass has created for other industries, namely tourism and commercial fisheries, which are cornerstones of southeast Alaska's regional economy. Managing the Tongass for timber, an industry that has been heavily subsidized by the taxpayer, accounts for not even 1 percent—less than 400—of Southeast Alaska's jobs. More profitable industries, on the other hand, such as tourism and commercial fishing, together generate more than \$2 billion in revenue annually and employ more than 10,000 people in the region.

The administration's move to rollback the Roadless Rule to expand logging in the Tongass follows decades of the federal government subsidizing timber sales in the Tongass, often at the expense of over \$20 million per year (1). For example, a controversial southeast Alaska timber sale this year, in June, on Kuiu Island, promoted heavily by the USFS, received no bids, despite significant federal subsidies that included USFS investments of \$3.1 million in new roads. Despite the expense to taxpayers, the USFS estimated the sale would generate just \$200,000 in revenue. This particular timber sale of old-growth lies in an area of Kuiu that contains one of the most important watersheds for salmon production in the Tongass, underscoring how focusing on timber production not only wastes vast amounts of taxpayer dollars but completely ignores environmental damage and species' dependence on intact ecosystems. Further, not only is the dwindling timber industry heavily subsidized by taxpayers, but it regularly exports unprocessed logs abroad, thus contributing little to the local economy; the USFS has already granted a waiver to allow timber logged on Kuiu to be exported to mills overseas for processing immediately following harvest (2).

The Tongass National Forest is home to more than 9 million acres of roadless area. The Roadless Rule protects ecosystems, which, in turn, helps make the Tongass the country's single most important national forest for carbon sequestration and climate change mitigation. As parts of Alaska are warming at roughly twice the rate of the rest of the planet, maintaining an intact Tongass ecosystem can help provide climate change solutions for Alaska and contribute to international climate efforts. Forest conservation plays a major role in the race to stem climate disruption. Deforestation, on the other hand generates nearly a quarter of all the world's greenhouse gas

emissions. The world must preserve its remaining old forests and the massive carbon reserves they've accumulated over the centuries if we are to reduce the impacts of climate change. Rather than destroying ancient intact forest ecosystems, the wood we use should come from sustainably managed plantations and young stands that quickly regrow and recapture the carbon they lose to logging.

I strongly urge you against granting any exemptions or exceptions to the Roadless Rule in Alaska, and advise the Forest Service to refrain from pursuing an Alaska version of the Roadless Rule. Rather, continue to uphold the 2001 Roadless Area Conservation Rule, as is offered in "alternative one," protecting these biologically rich, carbon dense, irreplaceable, and stunning forests.

Thank you for taking the time for my comment,

August E. Allen

Director

In the Shadow of the Wolf

(1) <https://www.taxpayer.net/article/u-s-forest-service-tongass-national-forest-financials/>

(2) <https://www.alaskapublic.org/2018/06/06/no-bids-on-controversial-old-growth-timbersale-again/>

[Position]