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First name: Wayne

Last name: Stauffer

Organization: Community of Elfin Cove

Title: Chairman

Comments: The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

Sonny Perdue, Secretary of Agriculture

October 30, 2019

U.S. Department of Agriculture

1400 Independence Avenue, SW

Washington, DC 20250

Victoria Christiansen, Chief of U.S. Forest Service

U.S. Forest Service

1400 Independence Avenue, SW

Washington, DC 20250

Dear Secretary Perdue and Chief Christiansen,

The Community of Elfin Cove is a Southeast Alaska-based non-profit corporation that operates under the State of Alaska's laws regarding unincorporated communities, representing the interests of the residents of Elfin Cove. We are dedicated to preserving, maintaining, enhancing and protecting the value of the community of Elfin Cove, the land we reside on, and the economic activities of our local populace. Elfin Cove is a small community of 30 to 130 people, depending on the season, located on the northern tip of Chichagof Island and surrounded by the famed fishing grounds of Cross Sound. The primary economic drivers in our community are commercial fishing, sportfishing lodges, and tourism and we have invested heavily in creating and promoting our idyllic town as a place to get away from the city rush and re-engage with the natural cycles and provisions of the forest.

Our reliance on fisheries for our economic livelihoods and food security compels us to voice our opposition to any change in current roadless rule protections, which protect the watersheds that we depend on to support critical spawning, rearing, and migratory habitat for the five species of Pacific salmon that call the Tongass National Forest their home. We support maintaining the 2001 Roadless Rule in effect on the Tongass and urge you to select a no action alternative.

Elfin Cove has a long history as a fishing community, being originally established as a fish buying station in the 1920s. Before it became a permanent community, it had long been a site for the fish camps of the Alaska Native peoples that lived off this land for millennia. The community has expanded from commercial fishing and is now home to several lodges that offer unparalleled sportfishing experiences to their clientele. In order to sustain Elfin Cove as a commercial fishing and visitor-industry community, we must sustain the productivity of the lands and waters of Southeast Alaska that we depend on for our salmon.

Southeast Conference's [Southeast by the Numbers] 2019 report states that commercial fishing and the seafood industry represents 10% of all employment earnings, with estimated gross earnings in excess of \$237 million. On the other hand, the visitor industry represents 11% of all employment earnings in the region and had estimated gross earnings exceeding \$249 million[1]. These two industries represent the backbone of Southeast Alaska's economy and are the largest private sector employers. Both of these industries' strong earnings and employment records will be threatened by a full exemption from the Roadless Rule.

We have seen the disastrous effects that the commercial timber industry has had on Southeast Alaskan watersheds throughout the 1950s-1990s, in which spawning habitat was destroyed so that bulldozers could use rivers as roads to access valleys and productive old-growth forest. While forestry practices have improved significantly since these days, the remaining intact watersheds that we have are critical to the production of the salmon resource that we depend on. It is essential that we do not sacrifice the long-term productivity of our watersheds and fisheries resources for what has always proved to be a short-term economic endeavor.

Recent declines in salmon returns and increased threats to salmon habitat present serious risks to the economic viability of the commercial fishing industry and the sportfishing industry that supports our lodges and fishers. Any type of development that threatens the recovery of these salmon stocks or their habitat could have long-term impacts on the fishing industry, and thus the Southeast Alaskan economy as a whole. High levels of development have all but destroyed the viability of salmon runs in the Pacific Northwest Coast, with numerous scientific studies pointing to the correlation between a decrease in salmon productivity and the increase of road density and large-scale clearcutting. Due to the importance of commercial fishing, sportfishing and small-scale tourism to our local economy in Elfin Cove and the wider regional economy of Southeast Alaska, the Community of Elfin Cove believes that maintaining this intact habitat is extremely important for regional economic security.

A full exemption of the Tongass from the 2001 Roadless Rule would undoubtedly lead to an increase in these resource extraction activities and their linked impacts. A full exemption would thus endanger our economic livelihood, our way of living in rural Alaska, and the salmon resource that sustains our communities. Opening up these lands to increased large-scale development activities could result in irreparable harm to fish stocks and production, as well as the commercial fishing industry and visitor industry as a whole.

We believe that the original 2001 Roadless Area Conservation Rule is doing its job by allowing responsible

economic development and protecting core habitat for fish and wildlife. This is why we are in support of a no-action alternative. Any alternative chosen should endeavor to protect the components of the Southeast Alaska economy that are already working; these include commercial fishing and visitor industries. We support the development of a prosperous, diverse economy for Southeast Alaska. We believe that maintaining an intact, healthy forest provides the basis for sustaining this economy, as well as sustaining the climate resiliency of our community and region.

Thank you for your consideration,

Regards,

Wayne Stauffer [ndash] Chairman

[1]<http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>

[See attachment containing the following technical resource: "A RESOLUTION BY THE COMMUNITY OF ELFIN COVE COMMENTING ON THE PROPOSED ALASKA ROADLESS RULE"]

[Position]

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