

Data Submitted (UTC 11): 11/20/2019 9:00:00 AM

First name: Chris

Last name: Kent

Organization:

Title:

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

Alaska Roadless Rule

USDA Forest Service

Alaska Region

Ecosystem Planning and Budget Staff

P.O. Box 21628, Juneau, Alaska 99802-1628

November 20, 2019

Re: Alaska Roadless Rulemaking #54511

During my professional career, I reviewed roading and timber logging plans on Native and U.S. Forest Service lands for the Alaska Department of Environmental Conservation. As part of this job, I inspected roading building and timber operations. My inspections took me from the island of Prince of Wales to State timber sales at Icy Cape. As a trained ecologist, it was disheartening to see intact ecosystem bisected by roads and forest cover total removed leaving only stumps. I was elated when the roadless rule was applied to Tongass forest as it best protects forest habitats from fragmentation and stream sediment from road building, logging activities and road use.

The Tongass has not been immune to the damage cause by road failures and sedimentation. The Alaska Department of Fish and Game Fish Passage Improvement Program noted in October of 2015 that assessment of 2,500 stream crossing covering the state's transportation network 1,192 are believed to impact fish movement in some way. Alaska Fish has also reported that as many as 66% of logging road culverts over anadromous fish streams, and 85% of resident dish stream crossing are not adequate for fish passage. The existing roads in the Tongass have given timber companies access to over 70% of the highest yielding timber (square feet of timber per acre). These areas are now cut over. There are over 10 billion remaining board feet in the Tongass that is accessible using the existing road system (4,650 miles).

A report by the Taxpayers for Common Sense citing a 2016 report by the Government Accountability Office calculated that the U.S. Forest Service has lost some \$600 million on its timber program.

The National Forest System currently has over 380,000 miles of roads crisscrossing our national forests. The American public has subsidized all of these roads. Nearly two-thirds (380,000 miles) of the current National Forest road system is in need of maintenance. Without maintenance these roads will continue to cause irreparable harm to streams, watersheds and habitats throughout the United States. Additional roading in roadless areas are expensive to construct and takes away from the need to improve the existing road system.

In 1995, the Forest Service released a comprehensive study of the impacts of logging on fish habitat in Southeast Alaska. The Report to Congress found that current measures "for anadromous fish habitat protection on the Tongass National Forest are less than fully effective, and additional protection is needed to make timber harvest more compatible with maintaining high-quality fish habitat and long-term conservation of anadromous fish stocks" (Report to Congress, p.11). "Procedures similar to those currently used to protect fish habitat on the Tongass National Forest (especially buffer strips along fish bearing streams) after being applied for nearly two decades to similar landscapes and conditions in coastal Washington and Oregon, failed to prevent declines in fish habitat capability, and resulted in increasing significant risk to the viability of salmon and steelhead populations." Current measures "for anadromous fish habitat protection on the Tongass National Forest are less than fully effective, and additional protection is needed to make timber harvest more compatible with maintaining high-quality fish habitat and long-term conservation of fish stocks."

The report also stresses the importance of freshwater salmon habitat. Researchers suggest that Pacific Ocean currents reverse directions on approximately 20 to 30-year cycles. The exceptionally high fish productivity in Alaska brought by northerly currents is believed to have peaked in the early 1990's and a continuing decline in productivity of fish stocks is anticipated as currents shift to the south over the next decade (Report to Congress, p.2). As ocean currents change, "salmon and steelhead populations and catches will probably decline and maintaining the freshwater habitats in good condition during these periods of unfavorable ocean conditions is essential to maintain the viability and productivity of salmon and steelhead populations...Rapid movement towards extinction [of natural fish stocks] is possible if both marine and freshwater habitat decline simultaneously" (Report to Congress, p.2).

In two scientific assessments mandated by Congress between 1993-95, agency biologists and prominent scientists raised serious concerns about the future health of brown bear, goats, wolves, salmon, and other old-growth dependent fish and wildlife on the Tongass if current rates of logging continue. In 1993, a committee of state and federal biologists concluded that current logging practices would fail to maintain "viable well distributed populations" of eight species. For example, places that are important to wildlife include such as Honker Divide, Cleveland Peninsula, and Port Houghton do not have sufficient habitat reserves to sustain wildlife populations.

I have spent considerable time kayaking in the waters of Southeast Alaska. The areas that I have come to know

and cherish are many. Some of the areas that I know well include the east Kuiu area. I have spent considerable time in Alvin and No Name Bays and Salt Lagoon. In No Name Bay there is a good example of the results of clearcut logging. Second growth has come in so thick that it is impossible to walk through. The canopy of single aged trees allows little light penetration to the forest floor, as a result there no growth of vegetation that would support wildlife. The conversion of these areas to second growth stands will diminish the carrying capacity of these lands to support wildlife. It will also force me to visit other areas where logging has not occurred. Keeping the remaining areas roadless is a boom to recreation and the protection of the fisheries. Additionally, protected areas are important to communities as subsistence and recreational areas.

I urge the continuation of current management of the Tongass National Forest in Alaska in accordance with the 2001 Roadless Rule.

Chris Kent

Girdwood, AK 99587

[Position]