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Comments: Ken Tu, Interdisciplinary Team Leader

Alaska Roadless Rule

USDA Forest Service, Alaska Region

Ecosystem Planning and Budget Staff

P.O. Box 21628

Juneau, Alaska 99802-1628

Re: Alaska Roadless Rule Petition

Dear Mr. Tu:

I am submitting formal comments regarding the Draft Environmental Impact Statement and proposed rule for the Rulemaking for Alaska Roadless Areas. I have spent twenty years on the Tongass National Forest, as a Forest Service contractor, a wildlife biologist with Alaska Department of Fish and Game, a professor and educator for Wild Rockies Field Institute and the University of Montana, as a resident of Petersburg, Juneau, and Haines communities, and as a recreational sea kayaker, climber, and hiker. I co-founded a small organization called "Last Stands" to ground truth old growth cedar and spruce forests across Southeast Alaska. I built an education curriculum that helped inform the establishment of the Tatoosh School on Prince of Wales Island. I have guided clients from around the world on boat tours, biking adventures, and other activities to celebrate the varied geographies of the Tongass. My part-time residence is in Haines, Alaska, where my husband and I are small business owners of an engineering firm that makes local Alaska products. I am the executive director for Audubon Alaska and a Vice-President for the National Audubon Society, where I actively work to protect the Tongass National Forest from further degradation. In 2019, we launched the Southeast Alaska Birding Trail which includes a regenerative tourism opportunity for 18 communities and 225 field sites across Southeast Alaska. In other words, I am a stakeholder in the Tongass National Forest. This has been the home of my professional life and career, but it is also my personal home. I appreciate the opportunity to comment on this rulemaking process.

1) The DEIS lacks analysis of the potential effects of the proposed rule, as well as any rationale for the proposed rule or alternatives

I submitted public comment for the original Citizens Advisory Council process that led to the drafting of this DEIS. 97% of the respondents said the process was not necessary, and that the roadless rule should be upheld on the

Tongass National Forest. Subsequently, it became clear the State of Alaska and the Trump Administration were going to forego public process and move ahead with the DEIS. The fact the agency chose Alternative 6, when earlier discussions had made it clear this was NOT the agency's preferred alternative, suggest that this entire process is politically motivated. The DEIS does not provide a justification for this process, for the alternatives, or for the potential impacts of the proposed rule. The agency needs to justify this process, not based on requests from the State of Alaska, but true justification under NEPA, and then follow up with specific alternatives that provide a suite of alternatives, including one alternative that provides for island-based land management plans that incorporate freshwater and nearshore marine resources. These island-based land management plans can be collated into a revised land management plan that reflects the true nature of the Tongass-an island system in a time of climate change.

2) There is no rationale or basis for eliminating roadless protections on the Tongass National Forest

The Forest Service does not adequately justify the need for this process in the DEIS. The Forest Service needs to justify the reasons for this process, especially in lieu of the fact that during the scoping process, a majority of respondents selected NO ACTION as their preferred action on this issue. Why did the Forest Service continue to proceed? It is not clear from the DEIS.

3) The DEIS fails to adequately address impacts to wildlife, old growth forests, and the impacts of island populations of all species, including endemic species

The DEIS incorrectly depicts moderate to high probability of maintaining viable, well-distributed wildlife populations for all species identified for the DEIS. Without providing any scientific analyses except referral to the Habitat Conservation Strategy in the 2016 TLMP, the agency uses no scientific rationale for their findings. On the contrary, many of the species, including endemic mammals and Management Indicator Species such as the American marten, illustrate declines on the Tongass since large-scale, industrial logging began in the 1950s. The agency ignores the best available science that illustrates the complexities of island ecology that will make the maintenance of viable, well-distributed populations very difficult under all alternatives in the DEIS. These recent population declines are also not reflected in the 2016 TLMP, which was deficient in addressing impacts to endemic mammals and reflected incorrect taxonomy of species including the marten (see below). Therefore, the agency cannot rely on the 2016 TLMP documentation to estimate potential impacts to wildlife species on the Tongass and must analyze the potential impacts to species using accurate habitat numbers (see attached wildlife report) which illustrate future habitat losses on some islands such as Prince of Wales increasing beyond the threshold for maintaining viable, well-distributed wildlife populations for endemic species such as the Queen Charlotte goshawk and others. The agency must provide the scientific basis, including reiterating this science from the 2016 TLMP amendment, in order to justify its current alternatives and lack of impacts. It cannot rely on old data, and must provide an accurate summary of current research, which was not done in this DEIS. Finally, the FS has to provide a species by species population viability analysis that matches with the analyses done for each endemic species in the 1997 TLMP, since the 2016 TLMP is only an amendment, the agency is still held to standard and guidelines in the 1997 TLMP which includes justification through specific population viability analyses. The agency did no work to address these issues in this DEIS and therefore its analysis of potential impacts is faulty.

4) The DEIS does not include an adequate analysis of the impacts of the proposed rule on the visitor industry, recreation and rural communities

As a member of the Alaska Outdoor Alliance steering committee, a visitor industry employee in southeast Alaska, and the leader of an organization that focuses a portion of our funding and activities on visitor industry opportunities and regenerative economies, the Forest Service did not provide an adequate analysis for impacts of the proposed rule on visitor use and rural economies. Instead, the FS refers to "commercial" use as timber harvest, instead of recognizing that "commercial" use in Tongass roadless areas FAR outnumbers commercial use in suitable timber lands. The FS does not recognize in its range of alternatives and impacts, the growing tourism economies and projections for the next ten years, illustrating an increase in over 25% of these landscapes. This analysis of impacts to tourism need to be done for areas that are already experiencing higher than normal tourism impacts such as: North Kuiu Island, Juneau and surrounding mainland locations, Sitka, Ketchikan and other areas. Many of these tours go into roadless areas on Kuiu Island, Prince of Wales Island, Revillagigedo Island, Mitkof Island, Baranof and Chichagof Islands, and there is no management discussion of the potential impacts of loss of roadless areas on the tourism and visitor industry.

The recreation economy has increased on roadless areas on the Tongass. In the last ten years, two new field schools (one located near Gustavus and the other located on Prince of Wales Island) are in operation, and many additional field research and education programs rely on roadless areas. The course I teach relies on the intact nature of the roadless areas near the LeConte Bay region. The DEIS does nothing to address the impacts of losing the roadless rule on the future of field education opportunities (part of the tourism and recreation economies in southeast Alaska). The DEIS should address these new uses of the forest. The FS has to justify why subsidies under the DEIS alternatives are going to distract from growing these economies. Instead of subsidizing timber programs, the FS could instead put money into the formerly robust cabin maintenance and recreation programs on the Tongass, spurring new economies in the region.

The DEIS does not address the harm that will be done to rural communities in southeast Alaska as part of this process-both the agency expenditures and time, as well as the impacts to rural communities that are in proximity to the Tongass roadless areas. The DEIS does not adequately address subsistence resources, the agency did not provide adequate subsistence hearing to the public as required by law under ANILCA section 810. The agency also does not adequately address concerns from Tribes in the region, which also represent communities in rural areas. The agency needs to justify the impacts of the DEIS on rural economic development as part of its DEIS. It currently only addresses the "timber industry" which is only two operators in the region, not an industry, and foregoes any mention of the myriad other industries in the region.

The DEIS also does not adequately address impacts to Southeast Alaska's watersheds and rural communities hydrologic power supplies and potential impacts as disturbance to these roadless areas will cause significant impacts to the water supplies for many communities. Roadless areas provide the high elevation snow and water for many communities' drinking water and hydropower operations. Building roads can cause sedimentation and other impacts. The DEIS does not adequately address the impacts of roads on community water supplies, and in order to adequately address these issues, the FS needs to map the watersheds, potential impacts, and provide statements as to why each of the alternatives will or will not impact these features.

As a resident of southeast Alaska, a long-time biologist and local business owner, tour guide, educator, advocate, and concerned citizen user of our public lands, I urge the FS to consider these comments, and the hundreds of thousands of other comments that ask the FS to select the NO ACTION alternative and stop this faulty process.

Sincerely,

Dr. Natalie Dawson

Anchorage, Alaska

Haines, Alaska

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