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Comments:

Management of the Tongass National Forest is at a critical crossroads where key environmental issues including timber harvest, road-less rules, and protection of watersheds require immediate attention.

I have been fortunate enough to learn about several regions of the Pacific Northwest, having lived in Oregon, Washington, British Columbia, and Alaska. I am concerned with the land management failures in Oregon, Washington, and British Columbia, and hope you will help ensure better policies are implemented to protect Southeast Alaska's irreplaceable ecosystems. Foreboding examples of management failures are evident in rivers like the Columbia, which now hosts less than a tenth of its historical run of 16 million fish. Another example is the fact that Pacific Salmon are now extinct in 40 percent of the rivers where they were known to exist in California, Oregon, Washington and Idaho. The runs that remain are significantly diminished. Previous inattention to over-development has left only a single watershed less than 50% developed in each of Oregon, Washington, and California. It is crucial to realize of all these areas, Southeast Alaska has the most proactive conservation opportunities still available. The region and the Forest Service are faced with defining a new paradigm for Tongass Land Management. The T77 requires progressing toward a sustainable future and moving beyond ill-fated practices of past.

Recently, Alaskan and 'Lower 48' scientists came together to publish a book titled North Pacific Temperate Rainforests, hereafter referred to as NPTR. It is important to recognize that "the consensus of the group was that a continuation of past management practices would likely have significant adverse effects on regional biodiversity and that further in-depth discussions and analyses would be useful to inform management decisions."

I ask you to consider the following concerns in moving forward with key environmental issues, such as timber harvest, road-less rules, and protection of watersheds.

TIMBER:

It is important to recognize that timber has been the most important modifier of North Pacific rainforests. Scientists agree that if logging continues in the locations and at the rates of the recent past that the overall landscape structure will increasingly diverge from historical patterns. This threatens our ecosystems as clear-cutting old growth forests significantly changes forest ecosystems. Younger forests differ strikingly from the original forests they replaced. For example, thicker second growth leads to less ground level vegetation, which leaves deer with little to no food, causing a cascade of impacts throughout the food chain (including humans). Additionally, old growth forest is a crucial piece in carbon sequestration strategies as well as providing multiple canopy layers supporting entire ecosystems that cannot flourish in harvested areas.

ROADS:

NPTR simply states, "new road construction should be avoided or kept to a minimum by careful planning to reduce fragmentation of remaining productive forest stands and wetlands." Road building and lack of road

maintenance have created problems in riparian zones that have persisted decades after harvest. Problems include, obstruction of fish movements, alterations in drainage patterns, ponding behind collapsed log culverts, and changes in groundwater flow beneath road prisms. Despite this, there are well over 6,000 km of roads built in SE Alaska. Given the island geography of the region, these roads further fragment habitats for numerous species, creating islands within islands. Roads have been clearly detrimental to our ecosystems. A survey of road conditions on national forest lands, including POW island, indicated that only 34% of culverts and bridges intersecting anadromous fish-bearing streams were adequate for adult and juvenile fish passage, and only 15% were adequate for passage of resident fish.

WATER:

Pressure from mining in Northern Coastal BC is an issue Southeast Alaskans will have to confront for the sake of watershed integrity throughout the North Pacific Region. In NPTR, Scientists proclaim, "protecting intact watersheds with high ecological values is an effective strategy for both maintaining the natural range of variation of forest types (i.e. habitat diversity), minimizing habitat fragmentation, and reducing negative road impacts within the protected watersheds. For these reasons, identifying and conserving a range of intact watersheds should be a part of any credible, systematic, science-based conservation analysis." We need to focus on preserving our intact watersheds and work proactively with our Canadian neighbors who share our watersheds. Currently, the provision of a well-regulated flow of high-quality water may be the most highly valued service provided by undisturbed forest ecosystems.

NPTR recommends, "watershed-based planning, and protecting intact watersheds in particular, should be a central organizing idea for the conservation strategy in the Tongass National Forest". Protecting whole watersheds usually protects variation in ecosystem characteristics and poses a distinct kind of opportunity for conservation of an integrated system of physical and ecological processes.

The opportunities to manage these forests proactively cannot be taken for granted. Proactive management is less costly than reactive management, which is often the only available option. The species on islands in the coastal North Pacific rainforest are clearly vulnerable and demand conservation efforts before it is too late.

I will continue to follow these issues and sincerely hope that the choices our public representatives make are keeping with the principles of conservation and thereby coinciding with needs of Southeast Alaska and Northern Coastal B.C. Thank you for your consideration.

See you downstream,

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RESOURCES

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