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Comments:

My name is Jerry Dzugan, I am a former commercial fisherman, charter boat operator, and subsistence user of these lands. I have been an Alaska resident for 40 years, and have lived in Sitka since 1979. I would like to request that the Forest Service keep the 2001 roadless rule in place and I support a no-action alternative. However, if the Forest Service chooses to craft a new rule, I would recommend that it include the following recommendations.

I would like to see all inventoried roadless areas on the Tongass remain protected under any new Alaska roadless Rule. I utilize all of the ABC Islands (Admiralty, Baranof and Chichagof) for subsistence and commercial fishing, as well as charter activities. I depend on these areas for deer hunting, sight-seeing, salmon habitat and the associated resource production, hiking, camping, kayaking, sailing, and spiritual worship; all the activities that depend on healthy, intact forests and the integrity of the beautiful landscapes that characterize Southeast Alaska.

I have made my living from a forested Tongass, and would like to see my livelihood and others like it protected. I also value the Tongass for its carbon sequestration abilities. Remote roadbuilding is an inefficient use of taxpayer funds, and I disagree with mass subsidization of the timber industry through this roadbuilding.

The type of activities that I would like to see allowed on the inventoried roadless areas in the Tongass are 'primitive' and 'semi-primitive' forms of recreation, including camping, hiking, and foraging in the wild as well as the creation of infrastructure to support said recreation opportunities including public use cabins, mooring buoys, and hiking trails. I also support watershed restoration on degraded landscapes, especially those in Northern Baranof that have been significantly affected by clearcutting activities in the 1960s. I support the development of fish-friendly hydroelectric development, taking in mind considerations of minimization of ecological impacts, and proximity to communities to decrease the length of inter-ties and powerline corridors. Hydroelectric development is important for an alternative to carbon based energy and will create a more resilient energy future for Southeast Alaska. The activities I would like to see prohibited in inventoried roadless areas are mining, road building, and old growth timber harvest especially. I further advocate for the inclusion of the Tongass 77 top-salmon producing watersheds in any new Alaska Roadless Rule, as well as the TNC conservation priority areas. I do not want to see hydroelectric development in these extremely valuable salmon and wildlife producing watersheds, along with timber harvest, road building, mining, or any other development; activities in these areas should be limited to remote and semi-remote recreation purposes only.

Please conduct a study comparing the costs of road building and compare with the timber revenue receipts (actual or estimated) and make the results of this study public so that the public can make an informed decision about where their tax dollars should be spent. I would also like to see an analysis of the carbon sequestration capacities of roadless areas in the Tongass and research that delineates how these areas contribute to local climate change mitigation and adaptation. I urge the Forest Service to look into possibilities for the Forest Service to participate in carbon credit programs at the state, national, and international levels. I would also like the Forest Service to maintain the 2016 Tongass Land Management Plan and commit to the transition to young growth harvest that they began 10 years ago, with the goal of phasing out old growth harvest on the Tongass.