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Comments:

The 2001 Roadless rule has worked well for the Tongass Forest and my number one suggestion is to not move forward on this expensive new Alaska Roadless Rule that may go nowhere should the current, pending lawsuits be resolved or dropped. If the state and US government must continue with this futile public process,* I support a 'no action alternative' that maintains the 2001 roadless rule on the Tongass.

Additionally, if a no-action alternative is not selected, I request the current inventoried roadless areas be expanded to include the Tongass 77 top producing salmon watersheds and the TNC/Audubon conservation assessment ecological priority areas (<https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Pages/CA-AKCFM.aspx>) in new, Alaska roadless areas. I also encourage the FS to include all current 'roaded' roadless areas under the new Alaska roadless rule protections; choosing not to emphasize restoration of the roadless characteristics of these areas just emphasizes the lack of accountability in 'value subtracted' effects along with the reported 'value added' verbiage used in our current economic system.

Despite having lived in Alaska for the majority of my adult life, I grew up in Florida and don't want to see the ecological destruction occur here that I witnessed by the time I was in high school. Back when the Everglades was more than just a national park and migrations of crab by the thousands occurred seasonally, the 'glades' was a huge, intact ecosystem. Now, that amazingly productive environment and all the creatures and living beings it supported is nearly gone, relegated to the area of the Everglades National Park, which is struggling. People don't think that can happen in Alaska but it can - and I want to make sure it doesn't.

I first came to Alaska in 1976, completing a 35 day college expedition from Alatna to Umiat, a distance of roughly 450 miles. I then worked for 5 months in Unalaska and always knew I'd be back. I love Southeast Alaska and made it my home.

The Tongass is an ethereal environment, like nowhere else in the world or even in Alaska. It is a treasured ecosystem that should be prized for its world class scenery, fishing, hunting and recreation opportunities, everything that Southeastern Alaskans and I love about our region. I want to see thriving, healthy communities that are not dependent upon one industry and the 2001 Roadless rule facilitates that goal.

The true economics of the pulp mill days must account for the 'value subtracted' effects that linger to the present. The roads did not recoup their cost; therefore, the timber industry was subsidized by the American public in the building of those roads while salmon habitat suffered and unmaintained roads became barriers to travel, overgrown with the alder and disturbed-soil plant growth.

* Defining 'futile': The timeline for public input is clearly for show, not for achieving a true public process. Just the timeline of other states' roadless rules or the timeline of the 2001 roadless rule proves my statement. This timeline will greatly limit, not facilitate public input.

Since timber appears the only significant industry that is targeted by this proposed new Alaska roadless rule and the only other major stakeholder appears to be for-profit Alaska Native corporations (roads built on Forest

Service land immediately adjacent to corporation inholdings, e.g., proposed road to Katlian Bay, ostensibly for access to a FS road), there appears to be no justification in pursuing this new Alaska roadless rule. The roads would be built with taxpayer money, creating conflict of interest and inappropriate favoritism in the process.

Tour boats not seeking areas of past logging for their customers to view, hunters and backcountry folks not seeking unmaintained logging roads for travel and Sitka deer not thriving in those areas compared to unlogged areas, are some examples of value subtracted. That means increased cost of fuel for travel paid by those businesses and recreators. Non-rehabilitated salmon streams impacted by logging financially affect fisheries. And not taken into account is that the majority of old logging roads were not maintained or completely restored to true wilderness. That missing cost is also 'value subtracted'. This legacy confirms the 'value subtracted' effects during the past Tongass forest logging boon were significant and the monetary costs not counted.

Places around Sitka that are very important to me, as well as currently being located in development LUDS that are protected by the 2001 national roadless rule include:

Ushk Bay, Poison Cove, Nawkasina Passage and watershed, and Salmon Lake. I absolutely want all areas around Sitka and Northern Baranof to remain roadless. Their intact ecosystem beauty and my ability to access them to spend time in the wilderness is invaluable to me.

The activities I want to see permitted on roadless areas under the new Alaska roadless rule are limited to primitive and semi-primitive recreation opportunities, as well as active and passive watershed restoration. I do not want to see any mining, timber harvest, or roadbuilding on inventoried roadless areas, for reasons previously outlined.

Roadbuilding is fiscally irresponsible at this critical juncture of increasing national deficit, and the timber industry does not contribute to the economy of Southeast Alaska in any meaningful way. Why should an industry that contributes less than 1% of regional revenue and employment be allowed to use the American public's forest for their own financial gain, while taxpayers pave the way for them to do so? Approximately 80% of what the industry is logging here is being exported as logs to other countries (China primarily). How does that fit in with President Trump's 'America First' focus and jobs at US lumber mills?

The financially responsible way of doing resource extractive activities after appropriate selections have been made (i.e. value subtracted/EIS/value added) and recognition of other subsidies/funding for other industries are taken into account, is to have these projects vetted by the American public, the true stakeholder being asked to fund the roads opening these new, expensive parts of the Forest to access.

Again, while our existing national road infrastructure is literally falling apart and posing safety hazards to the American people due to lack of funding, the public funding of new roads into current Tongass Forest roadless areas or adding more roads to 'roaded' roadless areas appears financially indefensible.

I know Senator Murkowski has been an advocate for the timber industry and has been involved in opening up roadless areas of the Tongass forest to logging. In this regard she does not represent my viewpoint. The new Alaska roadless rule appears biased toward timber, an industry that as mentioned before, accounts for a minuscule amount of Southeast Alaska's economy and which has not behaved responsibly for 'value subtracted' effects.

My recommendations to include in FS analysis of the environmental impacts of a new Alaska roadless rule:

Sitka and other Southeast communities are currently dealing with the 'value subtracted' consequences of previous logging and mining resource extraction activities, which haven't been part of an equation for evaluating any type of development/industry posed for an area. Those types of 'value subtracted' consequences are not being included in an EIS study. This needs to be an additional factor added to future evaluations. If it is not, 'value added' considerations need to be removed from the equation. Note, 'value subtracted' can be quantified, not just qualified. The National Park Service worked with a UAS graduate student to quantify the amount of money visitors to Mendenhall Glacier were willing to pay in order to fund a mitigation project aimed at slowing the recession of the glacier. Similar studies could be done for the Tongass forest and should be done.

I would like the Forest Service to do research into black ball sclerotium and its carbon sequestration abilities. We are just learning about new aspects of the forest that could have a vast impact on our assessment of how much carbon is sequestered by the Tongass, and no new logging should take place until after the carbon sequestration impacts of these previously-unstudied fungi are quantified.

I also request that the FS incorporate further studies of the impact of a roaded system that creates a 'value subtracted' effect for folks who make a living on tourism, use the area for subsistence and recreation.

Let the new Alaska Roadless Rule reflect the concerns of Southeast Alaskans who want to see prosperous commercial fishing, visitor and the other viable industries, and not raise the specter of past timber wars. Thank you.