



BACKCOUNTRY HUNTERS & ANGLERS

October 15, 2018

Alaska Roadless Rule
USDA Forest Service, Alaska Region
Ecosystem Planning and Budget Staff
PO Box 21628
Juneau, AK 99802-1628

Re: Comments Regarding the Notice of Intent to Prepare an Environmental Impact Statement for U.S. Forest Service ID: FS-2018-0059 - Alaska Roadless Rule #54511.

Transmitted via <https://www.fs.usda.gov/project/?project=54511>

Dear Ecosystem Planning and Budget Staff,

Please accept these comments on behalf of Backcountry Hunters & Anglers (BHA) and our Alaska chapter regarding Federal Register Document Number 2018-18937 announcing the Notice of Intent to prepare an Environmental Impact Statement for an Alaska Roadless Area Conservation Rulemaking that will address the management of inventoried roadless areas on the Tongass National Forest.

BHA is the voice for our wild public lands, waters and wildlife. We seek to ensure North America's outdoor heritage of hunting and fishing in a natural setting through education and work on behalf of fish, wildlife and wild places. With over 250,000 members and supporters and chapters in 34 states (including Alaska), Washington, D.C., Alberta and British Columbia, BHA is increasingly drawing support from sportsmen and women from across the continent. We represent the challenge, solitude and adventure that only the backcountry can provide, and we work to ensure that the backcountry is protected for the fish and wildlife that thrive there. In addition to advocating for policies that protect our wild public lands, we also promote ethical hunting and fishing practices, and protect special landscapes that have high quality fish and wildlife habitat values.

While we have concerns about a rule-making process that could unravel the strong existing Roadless Area management policies for the Tongass National Forest, we acknowledge the U.S. Forest Service for your efforts to establish a management vision that transitions forestry practices away from old-growth timber harvest and develops more thoughtful approaches for sustainable forest management. As we migrate away from obsolete practices that rely on heavy tax-payer subsidies, resources can be utilized more efficiently to effectively manage these wild public lands and waters, provide high quality fish and wildlife habitat, and support a mainstay of Alaska's economy.

I. Fish and Wildlife Resources Need to Be Prioritized in the Tongass

At nearly 17 million acres, the Tongass is the nation's largest national forest and the world's largest remaining intact coastal temperate rainforest. Of that wild backcountry, 9.3 million acres are inventoried roadless areas providing high quality habitat for a unique diversity of sought-after game species, including



BACKCOUNTRY HUNTERS & ANGLERS

mountain goats, black-tailed deer and both brown and black bears. The Tongass also encompasses thousands of miles of salmon-rich waterways, legendary among anglers and fundamental to the state's commercial salmon industry. The commercial fishing sector alone relies on the Tongass for more than 80 percent of its salmon and employs more than 4,300 people in the region, accounting for 9 percent of the area's entire employment. By contrast, timber production accounts for only 1 percent of the region's jobs. Nationally, these undeveloped lands and public wildlife resources help drive an \$887 billion economic engine from outdoor recreation like hunting and fishing.

If done poorly, a state rule-making process could set a slippery precedent that unravels Roadless Rule protections for the Tongass' most important forest products; the fish and wildlife resources and hunting and fishing industries. As a state rule-making process moves forward, the 2001 Roadless Rule should be the benchmark for improvements so that roadless policies only enhance the most important fish and wildlife habitats while preventing new development, road building and resource extraction in the Tongass' most sensitive areas.

II. Making Alaska's Roadless Area Conservation a Conservation Legacy

Currently, the most important forest resources in the Tongass are upheld by the 2001 Roadless Area Conservation Rule, a collaborative management approach adopted following one of the most extensive public engagement campaigns in the history of federal rulemaking. Despite litigation, objections from special interests and temporary uncertainty, roadless lands and waters in the Tongass have now been safeguarded for nearly 20 years, supporting a robust and sustainable tourism and outdoor recreation economy through traditions like hunting and fishing. Thoughtful leaders at the state and federal levels worked collaboratively with stakeholders to ensure that the commercial logging industry could also coexist side-by-side in the Tongass.

This success story is only in its beginning chapters, however, with the Transition Framework announcement in 2010 and implementation of the 2016 Tongass Land Management Plan (TLMP) amendment leading the implementation of a framework for a more science-based approach to forest management and timber harvest. The U.S. Forest Service is to be commended on its efforts to implement policies that favor sustainable approaches for young-growth forest management, maintain the integrity of old-growth forests and elevate protections for priority fish and wildlife habitats, such as the Tongass 77 and the TNC/Audubon Conservation Priority Areas.

The culture and communities of southeast Alaska are defined by these lands and waters and traditions like hunting and fishing. The 2001 Roadless Area Conservation Rule is essential to the future of this legacy and should serve as the basis for making improvements that enhance these values in any new Alaska-specific Roadless Rule.

III. Developing Alternatives that Prioritize Fish and Wildlife Habitat

BHA, as an organization, grew up on the 2001 Roadless Area Conservation Rule and supported this policy-making effort as one of the most robust and thoughtful collaboratives ever undertaken in the history of conservation on our public lands and waters. Through a rigorous public comment process, transparent



BACKCOUNTRY HUNTERS & ANGLERS

rule-making efforts in states like Alaska built a foundation for maintaining the integrity of our country's highest quality backcountry lands and waters.

However, in recognizing shifting political dynamics over the last two decades and the perennial pressures placed on our natural resources by competing uses and continued political swings, we strongly encourage the U.S. Forest Service to develop durable policy solutions that are insulated from these twin pressures by addressing a range of alternatives within the Environmental Impact Statement that elevate considerations for fish and wildlife habitat as indicated below:

- Prioritize continued protections for unroaded lands and waters in the Tongass that have been identified for their high-quality fish and wildlife habitat resources. Chief among these are the Tongass 77 (T77) and areas identified by the TNC/Audubon Eco-regional Conservation Assessment as Core Integrated Management Watersheds or Conservation Areas. The Tongass Advisory Committee (TAC) recommendations have specifically acknowledged these areas and advise preclusion from any future old-growth logging mirroring the 2016 TLMP amendment's suitability conclusion as "NOT suitable" for old-growth timber harvest.

The Tongass 77, while reduced to 73 areas after legislative intervention, represent the most important lands and waters supporting the most robust populations of fish and wildlife. The watersheds alone support one of the most significant trout and salmon resources in Alaska and were identified after rigorous mapping and collaboration with both state and federal biologists to identify the most vulnerable fisheries.

- Elevate consideration for big-game habitat, migratory waterfowl and hunting opportunities. The Tongass National Forest and its roadless areas represent some of the most sought-after hunting opportunities in the world to pursue an impressive range of species. Residents of southeast Alaska rely upon wild game and salmon for sustenance and survival with rural households consuming an average of 250 lbs of venison per year. Migrating waterfowl rely on stop-over habitat in the bays and estuaries of the Tongass. The Sitka spruce and hemlock forests provide some of the state's most uncompromised habitat for Sitka black-tail deer, elk, moose, and both brown and black bears. Migrating along the craggy alpine features of the Tongass, mountain goats provide world class hunting opportunities in some of the most challenging backcountry terrain and represent some of the greatest world records. 7 out of the top 20 Boone and Crocket mountain goats were harvested in the Tongass. Ptarmigan and grouse hunters can be similarly humbled and are also found in these elevations. The Tongass is truly a wild frontier where any hunter or angler can find solitude and solace in its remote wildlands.
- Inventoried Roadless Areas within the Tongass should be expanded to include all lands and waters within the Tongass 77 and TNC/Audubon Conservation Priority Areas that are currently excluded from existing inventoried roadless established in 2000. Additionally, all lands and waters identified in the 2003 Supplemental Environmental Impact Statement should be included as well. The ecological integrity of these wild lands and waters supports a complex network of intact fish and wildlife habitat driving a sustainable economic engine critical to the vitality of southeast Alaska.



BACKCOUNTRY HUNTERS & ANGLERS

IV. Conclusions

America's public lands and waters are a proud legacy stitched together by wild places like the Tongass National Forest and its roadless areas that not only support some of Alaska's best fish and wildlife habitat, but ground outdoor traditions like hunting and fishing and the rural economies that depend on durable policies that provide a sustainable future for communities in the Southeast.

The U.S. Forest service has an opportunity to partner with the state of Alaska to advance solutions that emphasize these values and modernize forest management practices by supporting current commitments to conserving intact fish and wildlife habitat in the heart of the Tongass while promoting a sustainable transition to timber harvest programs that focus on young-growth forests.

We encourage you to maintain the integrity of what may be America's best and most popular land management rule in history while considering the needs of local communities that may benefit from new policies within a state-specific rule that allow for reasonable flexibility to enhance resiliency. The costs to American taxpayers for road building and unconscionably subsidized resource extraction in the Tongass' unroaded lands and waters are too high, not to mention the irreparable impact to wildlife, water and outdoor traditions like hunting and fishing.

Thank you for your consideration. Backcountry Hunters & Anglers and our Alaska chapter leadership looks forward to working with you in partnership to advance thoughtful management policies that benefit our wild public lands, waters and wildlife.

Sincerely,

John W. Gale

Title: Conservation Director
Organization: Backcountry Hunters & Anglers
Phone: 303-746-3570
Email: gale@backcountryhunters.org
Address: 725 West Alder St, Suite 11
Missoula, MT 59802
Website: www.backcountryhunters.org