

December 16, 2019

Alaska Roadless Rule
U.S. Department of Agriculture
P.O. Box 21628
Juneau, AK 99802-1628



Re: Docket Number FS-2019-0023; Special Areas; Roadless Area Conservation;
National Forest System Lands in Alaska

Dear Sir or Madam:

On behalf of the members of the Alaska Chapter of the American Fisheries Society (Alaska-AFS), we respectfully submit these comments in response to the Proposed Rule and Draft Environmental Impact Statement (DEIS) released by the U.S. Forest Service (USFS) on October 17, 2019 to exempt the Tongass National Forest from the 2001 Roadless Area Conservation Rule ("Roadless Rule").¹

The American Fisheries Society (AFS), founded in 1870, is the oldest and largest professional society of fisheries scientists. The Alaska-AFS was formed in 1971 and boasts 300 – 500 members annually. Our common mission is to improve the conservation and sustainability of fishery resources and aquatic ecosystems by advancing fisheries and aquatic science and promoting the development of fisheries professionals. In submitting these comments, Alaska-AFS seeks to ensure the best available science is considered throughout the rulemaking process.

The proposed Alaska Roadless Rule would exempt the Tongass National Forest from the 2001 Roadless Area Conservation Rule and thereby remove that rule's prohibitions against road construction and timber cutting on all of the 9.2 million acres of inventoried roadless areas in the Tongass. Given the shift in policy of the proposed rule and the length and complexity of the DEIS, a 60 day comment period is insufficient to ensure that fisheries and aquatic scientists have the opportunity to provide meaningful input. Because of this potential, we request that USDA provide a minimum of 90 days (180 days) for review of the proposed rule.

In the limited time available for review of the proposed rule and DEIS, we find it fails to meet basic standards of scientific rigor. The assumption that road-building and logging can occur in currently roadless watersheds with no risk of significant harm to aquatic habitat and fisheries is unsupported by the science.

¹ 84 Fed. Reg. 201 at 55,553. Special Areas; Roadless Area Conservation; National Forest System Lands In Alaska. October 17, 2019.

The DEIS is an inadequate assessment of the potential impacts of roadbuilding, road maintenance, and resource extraction that the proposed full exemption would allow. Specifically, as described below, we find the DEIS is deficient because 1) impacts and risks to fish and their habitats are underestimated; 2) many conclusions are not supported by the data or analysis provided or are contrary to previous environmental impact statements conducted examining Roadless Area Conservation 3) removing existing protections to fish and fish habitat may open the door to future forest policy changes that result in loss of habitat 4) The speed at which the NEPA process and DEIS have been reviewed do not allow for adequate examination and review of critical impacts.

The Roadless Area Conservation Rule FEIS identified “numerous negative direct, indirect and cumulative effects” to aquatic and riparian habitat associated with road building and clearcutting in inventoried roadless areas.”² These negative effects “could potentially reduce the capacity and capability of key watersheds important for maintaining salmonid populations.”³ For example, timber roads and clearcutting can increase sedimentation, degrade water quality, fragment habitat, and increase high temperature regimes.⁴ Sedimentation alone has caused salmon productivity to decline in numerous studied watersheds.⁵ These “numerous” adverse impacts reduce salmon productivity in the following ways:⁶

The 2000 Roadless Area Conservation Rule FEIS identified clearcutting and timber road construction in inventoried roadless areas as having “the greatest potential for adverse effects to fisheries because it could cause declines in the populations of desirable fish species.”⁷ The FEIS also referenced numerous scientific studies showing that roadless watersheds or watersheds with low road densities are two to three times as likely to support strong salmon populations as watersheds with high road densities.⁸ Indeed, numerous studies show that watersheds with fewer roads are often associated with healthier fish populations.⁹

² U.S. Dept. of Agriculture Forest Service. 2000. Forest Service Roadless Area Conservation Final Environmental Impact Statement Vol. I. at 3-169. Washington, D.C. November 2000.

³ Id.

⁴ Id. at 3-163.

⁵ Id. at 3-166; see also Endangered and Threatened Species: Threatened status for Southern Oregon/Northern California Evolutionarily Significant Unit (ESU) of coho salmon. 62 Fed. Reg. 24588 at 24593 and 24599. May 6, 1997 (identifying sedimentation of stream beds caused by clearcutting and timber road construction as a major cause of salmon population declines throughout the species’ range).

⁶ Id. at 3-164.

⁷ Id. at 3-285-287.

⁸ Id. at 3-161.

⁹ Id. at 1-1.

All Roadless Rule repeal alternatives present significant risks of continued and serious fish population declines associated with habitat degradation caused by clearcutting and road construction on lands that currently provide refugia for fish populations in otherwise highly degraded landscapes. The DEIS, identifies “negligible” and minimal localized effects to fish and fish habitat and insists that clearcutting and timber road construction in inventoried roadless areas will not affect fish and fish habitat. We strongly disagree with this assessment.

The analysis in the DEIS is a significant departure from the Roadless Area Conservation Rule FEIS and the findings of expert scientists who reviewed the impacts of road construction and clearcut logging on anadromous fish habitat. These prior assessments identify adverse impacts not reported in the DEIS.

Alaska Department of Fish and Game fishery scientists have also identified strong negative correlations between logging road density, timber extraction and salmon productivity.¹⁰ These concerns are consistent with the numerous scientific studies showing that clearcutting and timber road construction in salmon habitat harms habitat productivity for salmon.¹¹

The no effects conclusions reached in the DEIS are not supported. Large scale timber harvest and road building substantially reduces habitat quality, even in areas where forested buffers are used on known anadromous streams.¹² Buffers in southeast Alaska are too narrow and tend to blow down, losing their effectiveness over time.¹³ According to the National Marine Fisheries Service, roads are a primary cause of salmonid decline, and may have unavoidable effects on streams regardless of how well they are located, designed or maintained.¹⁴

¹⁰ Id. at 54, 58, 205.

¹¹ USDA Forest Service. 2000. Forest Roads – a synthesis of scientific information (identifying degraded fish habitat by roads and a clear correlation between road density and fish production); M.D. Bryant & F.H. Everest. 1998. Management and conditions of watersheds in Southeast Alaska: the persistence of anadromous salmon; Halupka, K., M. Bryant, M. Willson, and F. Everest. 2000. Biological characteristics and population status of anadromous salmon in southeast Alaska at 54. Gen. Tech. Rep. PNW-GTR-461. Portland, OR. U.S. Dept. of Agriculture, Forest Service. Pacific Northwest Research Station 255 p.; U.S. Forest Service. 1995. Anadromous Fish Habitat Assessment.

¹² U.S. Forest Service. 1995. Anadromous Fish Habitat Assessment.

¹³ Id.

¹⁴ U.S. Dept. of Agriculture Forest Service. 2000. Forest Service Roadless Area Conservation Final Environmental Impact Statement Vol. I. at 3-169. Washington, D.C. November 2000.

In conclusion, as fishery scientists and resource managers, we are concerned that the DEIS will remove existing critical protections to highly valued fisheries and the watershed that they rely on and that the impacts were not adequately evaluated and therefore cannot be adequately considered, reduced, or mitigated. We do not believe the impacts and risks to fish and fish habitat have been fully described and we disagree with many conclusions reached based on the available data and science. The Tongass watersheds and the sustainable commercial, recreational, and subsistence fisheries they support represent a critical resource of national and global importance. The protections afforded this region under the current Roadless Rule support healthy and intact fisheries and fish habitat in one of the most productive salmon fisheries in the world, removing these protections would undoubtedly compromise the sustainability of the fisheries and the region. Consequently, until an acceptable scientific evaluation can be completed and reviewed, we recommend the No Action Alternative as the best path forward.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Joel Markis".

Joel Markis
President
Alaska Chapter of the American Fisheries Society