



**City of Gustavus, Alaska**

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December 14, 2021

Tongass National Forest  
Earl Stewart, Forest Supervisor  
648 Mission Street  
Federal Building  
Ketchikan, AK 99901-6591

Subject: Roadless Rule Exemption Proposal for Alaska

Reference: City of Gustavus Resolution CY21-15 Commenting on the USFS Roadless Rule Proposal

Dear Mr. Stewart,

The City of Gustavus strongly supports the proposed rule to eliminate the Tongass National Forest's exemption from the 2001 Roadless Rule.

The City, and our community generally, have long advocated for thoughtful, conservative forest management on the Tongass and for protecting the lands in our proximity in the Icy Strait region. In our view, timber should be made available for regional use, but on a small, sustainable scale that fully protects other forest uses and values.

We are proud to say that our efforts, in concert with other Alaskans, have resulted in a framework of protection and use that makes our region an example of sustainability. Part of the reason is that Congress in the late-1980s, with input from Gustavus, designated Pleasant Island, Lemesurier Island, the Inian Islands, and the Point Adolphus area as wilderness. It should be noted, however, that our advocacy was in response to the Forest Service planning a timber sale that would have clearcut seven miles of Pleasant Island's shoreline.

But one does not have to go far from Gustavus to find examples of destructive forestry. Consider the Forest Service's 55-million-board-foot Couverden Timber Sale, east of Gustavus. There, in the mid-1980s, the Forest Service spent over \$5.5 million building almost 30 miles of roads and eight bridges in advance of a timber sale that drew no bidders. When the Forest Service finally found a buyer for the timber (the now-defunct Alaska Pulp Company), its price was reduced to rock-bottom "base rates"—the lowest price for which the Forest Service could legally sell timber—which put its total value at about \$113,000, barely two percent of what the Forest Service spent building roads. The sale ultimately resulted in 1,700 acres of clearcuts laced by a deteriorating road system. Nearly 40 years later, regrowth in the area is sketchy.

Reversing the Roadless Rule exemption offers the best chance for protecting the last remaining large stands of old-growth forest in our nation. Old-growth trees are more than just pretty,

ancient, and awe-inspiring. At no cost to taxpayers (unlike the subsidized clearcut logging that has characterized the Tongass National Forest's management for decades), the Tongass 24/7 provides ecosystem services—clean water, clean air, fish and animal habitat, etc.—that are a major contribution to the health of our region. On a global scale, the Tongass's impact on climate change is significant. It is the world's largest relatively intact rainforest and represents one of the greatest carbon stores in the world. The urgency of slowing and eventually stopping the drivers of climate change was made very clear at the recent COP26 World Leaders Summit in Glasgow, Scotland. Protecting the Tongass and allowing it to do its work of storing and absorbing carbon is critical to maintaining America's resilience and to help slow climate change.

But there is more, far more. The Tongass provides important, irreplaceable habitat for many species of wildlife, including key subsistence species such as Sitka black-tailed deer. The watersheds in our old-growth forest are nutrient-rich and contribute to the natural wealth that surrounds us. By reinstating the protection of the Roadless Rule, the Forest Service can provide the best opportunity for these precious stands of old-growth timber to stay on the stump, doing what they do best: enriching and strengthening the natural environment of Southeast Alaska and helping slow climate change.

Reinstating the Roadless Rule will also help ease the transition away from large-scale old-growth logging in the region. Outside of roadless areas, there are still stands of old-growth under threat; we would like to express our support for a forest-management transition that moves swiftly away from any large-scale logging of old-growth timber.

We would also like to express our support for the new forest management direction outlined in the USDA's Southeast Alaska Sustainability Strategy (SASS). Primarily, we support the transition in management from a timber-producing forest to a forest that is being restored and managed primarily for recreation and ecological resilience. A conservative, relatively small local timber industry that is based primarily on the harvest of young-growth timber and produces value-added products should be a part of this transition.

The visitor/recreation industry is Southeast Alaska's largest private employer, accounting in 2019 for almost twenty percent of the region's employment. In the years immediately preceding the COVID19 pandemic, more than a million tourists visited Southeast Alaska annually. They didn't come here to see clearcuts; they came to experience a beautiful, wild landscape. Another approximately twenty percent of Alaska's revenue comes from the fishing/seafood industry. Some 5,000 streams in Southeast Alaska host salmon populations, and their health is critical to the health of the salmon fishery and the families and communities that depend on it. The timber industry currently accounts for less than one percent of Southeast Alaska's economy. It's time to focus on activities that are compatible with keeping our forest intact and healthy.

As we move through the transition, restoration work in the region's most heavily impacted locations—consider the damage logging did to salmon streams—will be critical, and local workforces can and should be developed to facilitate both restoration goals and recreation maintenance in forest management. Through this important work, many of the ecological services and the amenities that the forest provides can be restored and improved despite decades of damaging timber harvests.

Southeast Alaska's Indigenous peoples—the Tlingit, Haida, and Tsimshian—have inhabited this land for millennia. Their culture evolved around and depends upon a vibrant, healthy environment. Opportunities for customary and traditional uses by the Native community help

preserve the region's Native culture. We are encouraged that the new Tongass management direction (SASS) mandates a more meaningful engagement and consultation with the region's Native community.

Again, the City of Gustavus strongly supports the Forest Service's 2021 proposal to reverse the Roadless Rule exemption for the Tongass National Forest.

Sincerely,

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Mike Taylor, Mayor

Encl: City of Gustavus Resolution CY21-15 Commenting on the USFS Roadless Rule Proposal