



<https://www.bearbiology.org>

23 January 2022

Secretary Tom Vilsack
Department of Agriculture
USDA Forest Service
Attn: Alaska Roadless Rule
P.O. Box 21628
Juneau, Alaska, 99802
Email: sm.fs.akrdlessrule@usda.gov

and submitted at: <https://www.regulations.gov/comment?D=FS-2019-0023-0001>

FS-2021-25467

Agency: Forest Service (FS)

Parent Agency: Department of Agriculture (USDA)

RE: International Association for Bear Research and Management support to reinstate the 2001 National Roadless Rule for the Tongass National Forest by reversing the subpart E 2020 Tongass Exemption

Dear Secretary Vilsack:

The International Association for Bear Research and Management (<https://www.bearbiology.org>) is the professional organization of bear researchers and managers that supports the science-based management and conservation of the world's eight bear species. We engage 500+ international members, publish the peer-reviewed journal *Ursus* and *International Bear News*, fund research and conservation projects, and hold scientific conferences worldwide. Two components of our mission statement are to "Support sound stewardship of the world's bears through science-based population and habitat management" and "Provide professional counsel and advice on issues of natural resource policy related to bear management and conservation." In 2019, we provided comments on the Draft Environmental Impact Statement (DEIS) for the Alaska Roadless Rule. We supported the "No-Action" alternative, Alternative 1, as it offered the greatest benefit to protect the ecological integrity of this salmon-supported bear ecosystem in the Tongass National Forest (Tongass).

Based on our previous scientific assessment, the removal of the Tongass from the national Roadless Rule will likely have severe negative impacts on the long-term ecological health of the Tongass and important natural resources. Therefore, we support the USDA's current proposal to repeal Subpart E and return roadless management on the Tongass to the regulatory regime previously in force, which would result in the reinstatement of the 2001 Roadless Rule as provided for in the U.S. District Court for the District of Alaska's Judgment in *Organized Village of Kake v. USDA*, 1:09-cv-00023 JWS (D. Alaska filed May 24, 2011).

We have attached our previous statement with the scientific evidence which supports our position for inclusion with our comments supporting the current proposed repeal of Subpart E.

Thank you for your consideration of these comments.

A handwritten signature in black ink, appearing to read "John L. Hechtel". The signature is fluid and cursive, with the first name "John" being the most prominent part.

John L. Hechtel
President, International Association for Bear Research and Management (IBA)
Email: john.hechtel@bearbiology.org
<https://www.bearbiology.org>

Attachment: IBA Final Alaska Roadless Rule 17 December 2019.pdf