



THE IZAAK WALTON LEAGUE OF AMERICA

Web site: <https://www.iwla.org/>

November 27, 2019

Alaska Roadless Rule
USDA Forest Service
P.O. Box 21628,
Juneau, Alaska 99802-1628

SUBJECT: Alaska Roadless Rule Comments, Docket ID FS-2019-0023

I am writing on behalf of the Izaak Walton League Public Lands Committee and League Alaskan members to express our concerns on the future of unroaded and undeveloped public lands in the Tongass National Forest of Alaska.

The League feels Tongass National Forest is critically important for supporting subsistence and recreational hunting and fishing, as well as the commercial fishing industry in Alaska. The Tongass is also among the world's largest wild salmon-producing regions, contributing nearly 50 million fish to Alaska's multi-billion-dollar commercial salmon industry each year.

The League requests that the Forest Service adopt Alternative 1—the no action alternative—in the final (best) rule and that the 2001 Roadless Area Conservation Rule be maintained as the management directive for roadless areas within the Tongass National Forest. It is the best action to preserve the Tongass' fishery and outdoor recreational (economic) value.

If the Forest Service chooses to modify the application of the Roadless Rule on the Tongass, that decision must be balanced and durable, and any new development in roadless areas should be offset with increased conservation measures for the highest-value public lands. One way to achieve this would be to adopt Alternative 2 with modifications, such as adding conservation measures for the T77 and TNC/Audubon Conservation Areas outside of roadless area boundaries, as considered in Alternative 3. Any decision to log or develop those areas must be at the expense of industry using best management practices to minimize impact. With that comes the need for industry to pay for 3rd party verification of its practices. Finally all logging must pay a fair market value to the American taxpayer.