

**Larry T. Edwards**

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Via: <https://cara.ecosystem-management.org/Public//CommentInput?Project=54511>

Subj: Comments on the "Rulemaking for Alaska Roadless Areas" DEIS, and proposed Rule

Dear Mr. Tu;

I am a forty-three year resident of Sitka, and these are my personal comments. To be clear, I request that the No Action alternative be selected, or – better yet – that this rulemaking process be summarily terminated without a decision being made. I request this for reasons that follow, as well as for more detailed reasons given in two other comment submissions, by Alaska Rainforest Defenders and Earthjustice.

***Concerning Analysis and Disclosure of Impacts***

Forest Service officials at recent public meetings around Southeast and the DEIS both suggest that the action alternatives will merely shift where logging will occur, but will not change the impact of the Tongass timber program. That is false; the action alternatives will shift logging to areas of old-growth instead of second-growth. The roadless forests are primarily old-growth. The additional loss of old-growth forest will diminish forest ecosystem integrity and populations of oldgrowth-dependent mammals, and will harm subsistence hunters. None of this was adequately covered in the DEIS.

Focusing logging in whole or in part on roadless areas will result in more miles of road being built than otherwise, per amount of timber volume. Additional road mileage is detrimental to aquatic systems' water quality and habitat, and all that depends on the productivity of those systems – the fish, as well as subsistence-, commercial- and sport-fishing activities. None of this was adequately covered in the DEIS.

Logging in roadless areas, beyond what is already allowed by the Roadless Rule, will also impact the region's tourism industry. Tourism and commercial fishing are the region's economic engines, yet the action alternatives' economic impacts on them were not adequately covered in the DEIS.

The region's timber industry, which collectively operates on both federal and non-federal lands, is now almost entirely focused on the southern end of the region, below Frederick Sound. The cumulative impacts from nearly seven decades of logging in this part of the region and of the Tongass National Forest are immense. The DEIS did not adequately disclose those impacts or the additions to them that the action alternatives would cause.

***Concerning the Rulemaking Process***

Beyond the harm any of the action alternatives will cause to ecosystem integrity, to resources, and to recreational and non-timber resource uses, this entire rulemaking process – from its very beginning with the State's petition – is fundamentally baseless and corrupt. For details on corruption, see sections I thru III of Alaska Rainforest Defenders (23 Oct 2019) scoping comments.

But briefly, false pretenses underlaid Governor Walker's petition for rulemaking, which initiated this rulemaking process. The petition was every bit about logging, not the other reasons given instead. If those other (non-timber) reasons were true, the Chugach National Forest (which has no timber industry) would also have been fully included. Radical industrialists from the region's timber industry have been openly agitating at every opportunity for excluding the Tongass from the Roadless Rule, ever since the rule was adopted. Other reasons given by Roadless Rule opponents (access for mines, hydropower, community inter-connections, etc.) are fabrications – all 58 requests for building access across roadless areas have been timely granted.

Because Walker listened only to proponents (including timber- and other development-interests, including the Alaska congressional delegation) of eliminating the Roadless Rule, the State of Alaska did not conduct public scoping before submitting its petition for rulemaking. Public opinion and the spirit of democracy were irrelevant to Gov. Walker. Public scoping was done (jointly with the Forest Service) only *after* the petition was submitted and the rulemaking process had commenced.

The blowback from the State's ill-founded move that was immense – *even in the timber industry's strongholds, Ketchikan and on Prince of Wales Island* – during the region-wide public scoping meetings last year. And the blowback was just as immense at the DEIS openhouses and subsistence hearings conducted by the Forest Service this fall.

### **Conclusion and Requests**

My above personal comments are general and concise. Speaking for me on the details and specifics are the comments being submitted by Alaska Rainforest Defenders and by Earthjustice.

Please stop wasting your time and the public's funds on this senseless and destructive move toward any of the action alternatives. Please — end this rulemaking travesty, right now! Just end it, with no decision issued. The Forest Service's work-time and the funds that would be used to complete this rulemaking are most needed to plan, manage and accomplish the repair of red pipes on our streams in logged-off areas throughout the Tongass, and for fighting wildfires in the Lower 48. But if you do proceed, I ask the Decisionmaker to select the No-Action alternative.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Edwards". The signature is fluid and cursive, with the first name "Larry" written in a more stylized, looped script and the last name "Edwards" in a more straightforward cursive.

Larry Edwards