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Alaska Roadless Rule
U.S. Forest Service
Box 21628
Juneau, AK 99802-1628

Re: Application of Roadless Rule to the Tongass National

The Tongass National Forest should be fully exempt from the national Roadless Rule because the majority of the forest is already permanently set aside from timber harvesting and other development activities are difficult to achieve at best. Mining, energy development, and community access are severely inhibited by the Roadless Rule.

The National Forest Management Act planning regulations are the proper way to manage the remaining areas on the Tongass as a multiple-use forest. Exempting the Tongass from the Roadless Rule will not harm the region's fisheries. Fish habitat is fully protected in the national forest.

The Alaska Department of Fish and Game (ADF&G) records show that salmon populations have doubled in the region since timber harvesting began in the mid-1950s. This could not have happened if logging had harmed the fish habitat. Wildlife habitat is also fully protected on the national forest and wildlife is thriving in the young growth stands where timber harvesting has taken place over the last 65 years.

Most outdoor recreation on the forest takes place in or near the previously harvested areas because of the access provided by logging roads.

Timber harvesting has not impacted the tourism industry. Visitation to the region has sharply increased over the past 20 years. The forest products industry needs a larger timber supply in order to restore more year-around jobs and to help build stronger local communities and diversify the Southeast Alaska economy.

Even though 9.2 million acres of inventoried roadless areas in the Tongass would be freed from the roadless rule under a full exemption, only 168,000 acres would be added to the areas that may be considered for timber harvest. A much smaller portion of this acreage would actually be harvested due to ongoing restrictions, including buffer zones, wildlife preservation corridors, and other set-asides.

The full exemption does not change the projected timber sale quantity or timber demand projections set out in the 2016 Tongass Forest Plan. The Preferred Alternative increases management flexibility for how the forest plan's timber harvest goals can be achieved but does not fundamentally alter the plan's underlying goals or projected

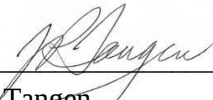
outcomes, including an annual harvest level of 45 million board feet, which is considered very conservative.

The Preferred Alternative would allow forest managers to tap parts of the forest where logging could be more cost-effective. That, in turn, would help local sawmills and boost the economy in Southeast Alaska. Some proponents of the Roadless Rule claim that the timber program on the Tongass costs taxpayers too much. In truth, the agency gets more in revenue than it spends in the areas that are harvested.

Environmental appeals and litigation have resulted in the loss of more than a third of all timber sales that were prepared since the Roadless Rule was administratively imposed. Roughly two-thirds of all remaining timber sale projects are never sold. These abandoned sales represent a loss to the taxpayers, but the timber sales that are allowed to go forward provide a significant positive revenue for the federal government and provide a lot of local economic activity.

If you have any questions about the foregoing, please do not hesitate to contact me.

Sincerely,
J. P. Tangen, Attorney at Law (P.C.)

By: 
J. P. Tangen