

Jason S. Morrison
Juneau, Alaska 99801

To: _____

The Honorable Sonny Perdue
Secretary – United States Department of Agriculture
1400 Independence Avenue S.W.
Washington D.C. 20250

RE: Alaska Roadless Rulemaking #54511

Please adopt Alternative 6 – Total Exemption Alternative – as the Final Rule in the matter of Roadless Rulemaking for the Tongass National Forest.

Please consider the following:

1. The Tongass National Forest contains approximately 16.9 million acres.
 - a. Of the total 16.9 million acres, 6.8 million acres have been set aside as Wilderness.
 - b. Approximately 0.7 million acres are currently available for road access.
2. A “No Action” Plan will deny access to the remaining acreages of approximately 9.2 million acres.

In a time of global warming concern, many “non-carbon” renewable energy resources will continue to have no access. Therefore, the Transportation and Utility System Land Use Designation that was eliminated in the 2016 Tongass Transition Plan and should be restored.

The U.S. Forest Service’s transition plan of 2016 projected that “only” 17,000 acres of “old growth” and 11,000 acres of young new growth would be harvested in the next 100 years. Thus only “one-one thousandth” of the old growth forest would be harvested in the next 100 years and only “three one-thousandths” of all timber would be harvested in the next 100 years.

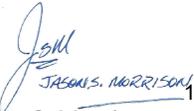
Each new exception set out in Appendix G, alternatives 2 - 5 is preceded by the words “if the Responsible Official determines that.....a road is needed,” which effectively leaves it up to the Forest Service (and other officials) to make the determination about whether a road is needed without any criteria for doing so.

In 2003 the USDA stated:

The Department has concluded that the social and economic hardships to Southeast Alaska outweigh the potential long-term ecological benefits because the Tongass Forest Plan adequately provides for the ecological sustainability of the Tongass. Every facet of Southeast Alaska’s economy is important and the potential adverse impacts from application of the roadless rule are not warranted, given the abundance of roadless areas and protections already afforded in the Tongass Forest Plan.

Adoption of Total Exemption is the only fair and responsible alternative.

Respectfully,


JASON S. MORRISON
Jason S. Morrison. 16 December 2019