

December 17, 2019

**VIA FOREST SERVICE COMMENT PORTAL AND E-MAIL**

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Re: Comments on Alaska Roadless Rule, 84 Fed. Reg. 55,522

Dear Mr. Tu:

I respectfully submit these comments on the U.S. Forest Service's October 17, 2019 proposed rule to exempt the Tongass National Forest from the national Roadless Rule. Having lived in Alaska for 40 years and being Juneau residents for 35 years, my family and I directly benefit from the social, spiritual, economic and ecological values provided by the Tongass National Forest, and have a vested interest in preserving its ecosystem health. I urge the Forest Service to select the No Action Alternative and maintain existing protection for the roadless areas of the Tongass and Chugach National Forests. The No Action Alternative is the only alternative that meets the purpose and need for the proposed rulemaking while protecting the globally and regionally important values of the Tongass.

The Tongass National Forest, located in Southeast Alaska's Alexander Archipelago, is a largely untouched remnant of the vast temperate rainforest that once extended along the Pacific Coast from Alaska to northern California. Stretching roughly 500 miles from Ketchikan to Yakutat, the the Tongass features a diverse landscape of boundless forests, sweeping glaciers and towering coastal mountains. Its network of old-growth forests and protected areas provide exceptional carbon storage, support vibrant subsistence lifestyles, harbor populations of old-growth dependent wildlife that are threatened in other states, protect healthy salmon streams and fisheries, and offer unparalleled opportunities for outdoor recreation and appreciation.

In addition to providing countless ecosystem services, the Tongass is further important to the millions of people—including 1.2 million people in 2016 alone—who have visited the area. For many of these visitors, visiting the Tongass is a once-in-a-lifetime experience. Even people who have not visited value the Tongass and “benefit from knowing that [it] is there” and that it will be “left for future generations to inherit” (Draft EIS at 3-23).

Despite its inherent value, the Tongass has faced significant threats from logging and high grading in the past. In some areas of the forest, only about 20 percent of the watersheds remain intact.<sup>1</sup> This

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<sup>1</sup> Forest Service, Tongass National Forest, Land and Resource Management Plan Amendment at 3-197 (2016) (2016 Forest Plan).

clearcutting of the most valuable areas of the Tongass has come at great taxpayer expense, costing an average of \$30 million each year.<sup>2</sup> In recognition of the dwindling acres of unfragmented national forest, the Roadless Rule was adopted in 2001 to ensure that these valuable forests remain protected. The Rule was applied to the Tongass specifically to protect its “extraordinary ecological values” and the Forest’s “unique and sensitive ecological character,” yet the Forest Service is now proposing to eliminate the Roadless Rule on the Tongass, putting those globally important values at risk with no clear, countervailing benefits.<sup>3</sup>

The Forest Service’s proposal is contradictory. The proposal claims to support the timber industry by providing flexibility to offer more economic timber sales, yet the analysis in the Draft EIS assumes that logging levels will not increase and that, instead of using that “flexibility,” logging will be evenly-distributed across the suitable timber base forest wide. These assumptions, and the lack of any site-specific information about future timber sales, underpin the entire environmental analysis. Without more detailed information, it is impossible for the public and decision-makers to accurately assess the adverse effects of the proposed action on wildlife, subsistence, ecosystem health and biodiversity, tourism, and other forest resources.

I am especially concerned that this proposal ignores the fact that the Tongass is one of the country’s last vanguards in the fight against climate change. Storing carbon equivalent to 8% of that stored in forests in the conterminous United States, the Tongass is a critical source of carbon storage, extracting excess carbon dioxide from the atmosphere. Reducing this carbon sequestration capacity increases our vulnerability to global change, which is a threat to my family, community, state, and nation.

Furthermore, in pushing forward with this proposal against widespread public opposition, the Forest Service has neglected its duty to the Alaska Native tribes who live in and depend on the forest and have been its primary environmental stewards for thousands of years. The Forest Service has so far failed to meet its obligation to engage tribes on a government-to-government basis, and has not taken into consideration their views and requests as cooperating agencies.

Moving ahead with the proposal to revoke the protections of the Roadless Rule from the Tongass would threaten the important social and ecological values of the Tongass, defy the views expressed by local communities and tribes that depend on an intact forest, and incur costs to the American taxpayer through subsidies to prop up a failing industry at the expense of other critical sectors of the regional economy. For all of these reasons, I urge you to adopt the No Action Alternative.

Thank you.

Sincerely,

Jim R. Ayers

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<sup>2</sup> Taxpayers for Common Sense, *Cutting Our Losses: 20 Years of Money-Losing Timber Sales in the Tongass* (Oct. 2019) at 1.

<sup>3</sup> 66 Fed. Reg. 3244, 3254 (Jan. 12, 2001).