Comments on proposed exemption of Tongass NF from Roadless Rule

Thank you for the extensive analysis. Unfortunately, I am adamantly opposed to the USFS granting a blanket exemption of “Roadless Rule” on the Tongass National Forest (Alternative 6). I am familiar with the overall history of the Roadless Rule and have reviewed the petition document from The State of Alaska posted on the USDA website along with the summaries of the Alternatives. The complicated history of the exemption for the Tongass nearly obscures some underlying facts.

1. Having a uniform policy on this subject for ALL federally managed public lands within its scope was the original intent and is still necessary to prevent piecemeal erosion of the values that the policy was intended to preserve. It is also still is the clear desire of millions of Americans who have weighed in on the Roadless Rule over the years. Piecemeal exemptions will eventually result in a state-by- state or forest-by- forest set of rules that will not serve the broader National goals of conservation of wildlands with the attendant environmental and human benefits. Arguing that the Tongass Forest Management plan provides adequate protection is insufficient. Arguing that Alaska is “unique” is not persuasive. Yes, Alaska is very different in many ways from much of the rest of the country. But that in itself does not justify blanket exemptions. Every state can argue that their situation is unique in some way.

2. The economic arguments always seem compelling but they turn out to be short-lived (or just wrong) as world markets and technologies change. Many of us have seen this first hand here in Washington state where the timber industry was forced to evolve –ultimately for the better-- after the recognition of the need to protect remaining old growth habitat and to rein-in dysfunctional corporate and governmental policies and practices. I am not anti-logging; I was an employee of a timber-based company for many years and I believe harvest in appropriate areas can be done sustainably. However, there is no justification for harvesting old growth in the Tongass or anywhere else in this country. Have we not learned our lesson?

3. In the analysis, the Agency has outlined alternatives with much narrower exemptions which strike a more reasonable balance between economic activity and conservation requirements. Please reconsider some of these. A total permanent exemption for the entire Forest is completely unnecessary at best and may turn out to be extremely damaging in ways that we cannot fully predict or control.

Respectfully submitted,

Margot Tsakonas