

Meredith Pochardt
Juneau, AK 99802

December 17, 2019

USDA Forest Service
PO Box 21628
Juneau, AK 99802

RE: Alaska Roadless Rule

Dear US Forest Service:

I would like to take this opportunity to strongly urge the Forest Service to maintain strong conservation for the Tongass National Forest (TNF) by retaining the 2001 Roadless Area Conservation Rule (Alternative 1), which prohibits tree harvest and road construction/reconstruction within inventories roadless areas, or by adopting Alternative 2 which represents a slight change from the 2001 Rule but preserves the intent – to maintain healthy, functioning watersheds on the TNF. These alternatives ensure the public values of the TNF will be maintained.

The 2001 National Roadless Rule is well designed and flexible enough to allow for access and development projects in a responsible manner. Since 2009, 48 projects have been approved on the TNF. The USFS has already taken steps to expedite this approval process, now taking only one to three weeks. This is not a prohibitory process, it is a necessary one. This is a process that ensures the value of the TNF is retained for those whom own it – the public.

Additionally, a full Regulatory Risk Assessment should be conducted for any such rule change that increases the timber harvest of the TNF. The Federal Register vol. 84, no. 201 states that the economic value of the TNF is less than \$100 million, as measure in 1994 dollars, and therefore is exempt from conducting a full Regulatory Risk Assessment. While the peer-reviewed journal article by Johnson et al (2019)¹ indicates that the fishing value alone of an in-tact TNF is estimated at \$84 million (1994 value corrected for inflation). This does not include the economic value of tourism, recreation, or subsistence harvest on the TNF. With a full economic analysis of the TNF it would clearly indicate that the current in-tact Tongass is a significant economic driver to the Southeast Alaska region, well over \$100 million annually.

For these reasons, again, I strongly urge you to adopt Alternative 1 or 2 and preserve the good work of those who established the 2001 National Roadless Rule on the Tongass National Forest.

Thank you for your consideration. I look forward to a response on your decision.

Meredith Pochardt
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Juneau, Alaska

¹ Johnson, A., Bellmore, R., Haight, S., Medel, R. (2019). Quantifying the monetary value of Alaska National Forests to commercial Pacific salmon fisheries. *North American Journal of Fisheries Management*. 0275-5947.