Data Submitted (UTC 11): 10/26/2019 8:00:00 AM
First name: Galo
Last name: Maldonado
Organization:
Title:
Comments: Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska

Roadless Areas Conservation Rule has been in place since 2001, established by the Clinton administration to conserve the remaining wildlands in our national forest system1. This consists of conserving about a third of the national forests system in which road building and logging are off limits1. The rule was established after both a year of hearings and public comments, this included more than 180 American Indian and Alaskan Native groups, eight federal agencies, 600 public meetings, 2 million comments received, and seven separate hearings2. One would reason that by no means has the Clinton administration rushed to conclusions on the ruling, rather the rule was conceived in due process. The main argument held by the opposition to the rule and in this case, those wishing to exempt the Tongass National Forest from the Roadless Area Conservation Rule is that of usurped power and negative economic impact through lost opportunity2.

Watershed conservation is a key attribute to the Roadless Areas Rule, as conserving these areas in its natural state will allow for both untampered drinking water sources, reduction of the need for water treatment, and an overall better air quality2. The planned timber sales in a roadless area will also yield a net deficit, as the cost of procuring timber in roadless areas yields high costs as realistically air transport is economically unreasonable2. While most benefits of the Roadless Areas Rule are qualitative there are some quantitative benefits. The USDA spends an estimated $8.4 billion in deferred maintenance and reconstruction on roads within the national forest system, the Roadless Areas Rule is set to save approximately $219 million a year in maintenance on a program which already receives less than 20% of the funds required to upkeep current road infrastructure2. As George Lennon spokesman to the service stated The rule will limit access only to the places loggers or harvesters have so far found no reason to harvest3.

Removing protection from these lands will also hurt ecosystems in terms of both altering the terrain and loss of biodiversity. Terrain in the Tongass National Forest is plenty uneven ranging from coasts to peaks, the construction of roads into the park will surely result in clearing areas of old growth forests leading to heavy topsoil quality loss and erosion1. Couple this loss of pristine natural terrain with the loss of its various native species and the area is set to transition into a whole new ecological landscape. The Forest Service has reviewed roadless areas three times: Roadless Area Review and Examination, Roadless Area Review and Examination II, Roadless Area Conservation Review4. These showed an incremental requirement to hold current roadless areas within their natural state, the latter leading to the ruling4. Continuing research shows that intact natural environments were found to be a refugia for native species and are crucial for forest integrity and function5.

Based on the facts and available research on the topic I believe it is in the best interests for the USDA to maintain the Tongass National Forest within the bound and regulation set by the Roadless Area Conservation Rule. This would promote the land as a haven for native flora and fauna and cement the rulings status. The exemption of the ruling might serve as a stepping stone to facilitate removal of the ruling over other roadless areas, this would go against decades of scientific research compelling to the invaluable position of these ecosystems.

1 A BLIND FOREST ROAD POLICY. (2006). Landscape Architecture, 96(12), 132-130. Retrieved from http://www.jstor.org.access.library.miami.edu/stable/44675724

2 Hoyt, A. (2001). Roadless Area Conservation: How the "Roadless Rule" Affects America's Forestland. Tulane Environmental Law Journal, 14(2), 525-547. Retrieved from http://www.jstor.org.access.library.miami.edu/stable/43292607

3 Carney, supra Note 8

4 Turner, J. (2006). Conservation Science and Forest Service Policy for Roadless Areas. Conservation Biology, 20(3), 713-722. Retrieved from http://www.jstor.org.access.library.miami.edu/stable/3879240

5 Strittholt, J., & Dellasala, D. (2001). Importance of Roadless Areas in Biodiversity Conservation in Forested Ecosystems: Case Study of the Klamath-Siskiyou Ecoregion of the United States. Conservation Biology, 15(6), 1742-1754. Retrieved from http://www.jstor.org.access.library.miami.edu/stable/3061275

[Attachment is an image version of the same comment above.]

[Position]