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Organization:

Title:

Comments: Public Comment

The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

In this proposed rule, the United States Department of Agriculture is proposing to make the Tongass National Forest, a forest found in Southeastern Alaska, from the 2001 Roadless Area Conservation Rule. The 2001 Roadless Area Conservation Rule protects forests across the United States from being demolished by deforestation due to the construction of roads by creating protected inventoried roadless areas. The 2001 Roadless Rule currently protects millions of acres of forests across the United States, and is therefore an important environmental protection. In this proposed rule, the USDA seeks to remove this protection from large portions of forest land in Alaska. I do not think that the USDA should seek the total exemption of the Tongass National Forest, as this will cause lasting damage to the Alaskan ecosystem and contribute to global climate change.

The Tongass National Forest is the largest national forest in the United States, and it covers 16.7 million acres of land across the state of Alaska. The forest has had a long history of logging and a heavy presence of the timber industry due to its large size and abundance of timber. In addition, there has continually been controversy between environmentalists advocating for the protection of the forest and those promoting the interests of the timber industry. Specifically, in the years since the adoption of the 2001 Roadless Rule, there has been significant debate about the inclusion of the Tongass Forest as an inventoried roadless area. Proponents of the exemption of the Tongass National Forest assert that it will help to boost Alaskan industry, specifically the state's struggling timber industry. Those such as Alaska Senator Lisa Murkowski argue that more than 13 million acres of the forest are already protected by other environmental protections such as national monument designation, therefore the total exemption of the Tongass would not have a significant negative impact.

Proponents also argue that the exemption of the forest would not result in immediate, large-scale deforestation and destruction, rather it would simply allow the struggling timber industry to log certain areas without causing significant environmental damage.

Opponents of the proposed rule, such as the environmental non-profit organization Earthjustice and Alaskan Native American tribes, argue that the total exemption of the Tongass from the 2001 Roadless Rule would lead to permanent damage to the environment and exacerbate the negative effects of climate change on the Alaskan ecosystem. In the summary of the proposed rule, the USDA states that "the proposed rule would not directly authorize any ground-disturbing activities," however it is clear that this rule would inevitably lead to so-called "ground-disturbing activities" and deforestation in these areas. The logging of old-growth trees like those found in the Tongass is scientifically shown to lead to environmental damage such as loss of biodiversity and contribute to climate change due to carbon emissions.

Personally, I strongly object to the exclusion of the Tongass National Forest from the 2001 Roadless Rule. The total exemption of the forest would allow the logging industry unchecked access to a large part of this critical ecosystem, which would lead to a slippery slope of deforestation that would cause irreversible damage. It would

take decades to recover from the logging of large portions of the Tongass, and we do not have decades to spare as climate change rapidly destroys our world. Therefore, I encourage the USDA to reconsider its exemption of the Tongass National Forest from the 2001 Roadless Rule.

Sources:

- <https://www.regulations.gov/document?D=FS-2019-0023-0001>
- <https://www.sierraclub.org/mother-lode/yahi/national-forests-and-roadless-rule>
- <https://www.juneauempire.com/opinion/opinion-roadless-rule-realities/>
- <https://www.npr.org/2019/10/24/772939221/trump-wants-to-exempt-tongass-national-forest-from-roadless-rule>
- <https://www.adn.com/opinions/2019/10/20/trump-administration-right-to-pursue-tongassexemption-from-roadless-rule/>
- <https://www.alaskapublic.org/2019/10/15/forest-service-proposes-roadless-rule-exemption-for-tongass/>
- <https://www.fs.usda.gov/tongass/>
- <https://earthjustice.org/features/tongass-old-growth-climate-change>

[Position]

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- <https://www.juneauempire.com/opinion/opinion-roadless-rule-realities/>
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- <https://www.fs.usda.gov/tongass/>
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[Position]