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Organization: ADK Alaska, Professional Services

Title:

Comments: my comments on roadless rule exemption for Tongass

Attached are my personal comments on the proposed Tongass rule-making, as a lifelong Alaskan resident, and of both Ketchikan and Anchorage currently.

Thank you.

Christine Klein

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ADK Alaska, Professional Services

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Alaska Roadless Rule Project #54511

U.S. Forest Service

P.O. Box 21628

Juneau, Alaska 99802-1628

November 6, 2019

RE: Alaska Roadless Rule Exemption, project 54511

My name is Christine Klein, a lifelong Alaskan, raised on a subsistence homestead near Ketchikan. A homestead continuously inhabited for over 100 years by people relying on the forest for both income and food. I am ever grateful for an Alaska Loggers Association scholarship in the '80's that enabled me to attend engineering college, and be the 1st in my family to obtain a degree. Unfortunately, after finishing there were no longer jobs to return home to. I have watched the situation continue to progressively worsen over the past 20 years, as hundreds of SE residents are forced to leave the forest we love due to unaffordability and scare jobs.

I'm here to support a Tongass National Forest full exemption from the national Roadless Rule.

1. U.S. Dept. Agriculture previously determined in 2003 and 2010 to exempt Tongass from roadless rules.

The reasoning and facts supporting that decision remain valid; however, the socio-economic conditions and long-term damage to lower and middle-class residents, has only worsened across the region over that timeframe. A Tongass roadless rule exemption is urgently needed because the continued and severe economic impacts to SE

Alaska are unjustifiable. For example:

1. 3,000 jobs have been lost across the entire region reducing economic diversity.
2. In Ketchikan the 2nd largest city, 20% of its students and families have left.
3. The Ketchikan Borough has lost another 63 full time jobs in just the past two years.
4. Families have had to leave for living wage jobs elsewhere as average annual wages dropped to \$48,000 and the cost of living has risen to 100% higher than the national average.
5. Over 41% of all children in Ketchikan are now eligible for food assistance at school.
6. Region demographics for the 1st time have changed from a majority of a young and working age population to one of primarily non-working, retirees, and elderly.

2. Tongass National Forest is already strongly environmentally protected, as proven by rich abundance of wildlife. It has 19 wilderness designations (39%) and another 58% in other permanent set-asides that prohibit development. This leaves less than 3% or 552,000 acres for multiple uses, that are tightly regulated by Tongass Forest Management Act prescribing Forest Plans each 10-15 years. An exemption will restore the normal Forest Plan planning process that's worked successfully in protective measures:

1. Deer habitat is maintained to sustain wolf populations and hunters are allowed to take 4-6 deer annually. Historically, the best hunting continues to be in young growth and harvest areas.
2. Alaska Dept. of Fish & Game's records show that salmon populations have doubled in the region since the time commercial timber harvests began in the 1950's.
3. Wildlife habitat is fully protected and thriving in young growth stands.
4. Timber harvests have not impacted tourism as visits and tour ships have regularly increased since the 1970's, grew over 15% in the past two years, and are expected to continue growing.

3. SE communities are surrounded by Tongass federal lands making up 95% of the region. It restricts access

still needed for basic roads, airports, energy transmission lines, natural resources, and infrastructure[mdash] things required for healthy communities and diverse economy. Existing Tongass set asides, and now the roadless rules being instituted by default has created wilderness area without authorization, and without regard to our local human inhabitants and average citizens. It imposes artificially high living costs,

primarily low wage seasonal job opportunities, and social instability in the region. Simply put, Tongass being managed as a wilderness or park violates the promises made to us of no more land withdrawals and set-asides, and is not accessible to multiple uses for which it was created:

1. President Roosevelt, established Tongass National Forest in 1907 stating: "...1st and foremost you can never afford to forget for a moment ... the object of our forest policy ... is not to preserve the forests because they are beautiful, though that is good in itself, not because they are refuges for wild creatures... though that too is good... the primary object of our forest policy, as the land policy of the US, is the making of prosperous homes."
2. The 2016 Tongass Forest Plan included a harvest level up to 45 MMBF; yet USFS has met less than 30% of its own annual timber supply projections due to the continuous appeals, litigations, and delays faced. Despite collaborating with the other private land-owners the past 4 years as recommended by the Tongass Advisory Council (TAC), these actions have continued to happen.
3. Our few remaining timber sawmills and companies are starving for supply. The unpredictable and unreliable log supply provided from the Tongass threatens their very existence.

4. A Tongass National Forest roadless rule exemption is needed and appropriate for SE Alaska:

1. To maintain access to the regions many remote towns and communities which it surrounds.
2. To provide materials for the few small timber companies that still remain and exist locally.
3. Only 168,000 in added acreage would be considered for timber harvest. In reality, much smaller portions could be utilized due to existing management restrictions, buffer zones, topography, stream setbacks, wildlife preservation corridors, conditions, and set asides.
4. It will not change the region timber sale quantity or demand projections previously established.
5. It will increase USFS flexibility for how harvest goals can be achieved, and enable foresters to access areas where logging could occur more cost-effectively.
6. and, Tongass National Forest was created, intended, and promised to us to be a working forest. One that is accessible and beneficial for multiple users and all socio-economic classes.

Our region, communities, and families need a Tongass National Forest Roadless rule exemption for survival. Thank you.

Sincerely,

CHRISTINE E KLEIN

Christine Klein

cc:

Senator Murkowski
Senator Sullivan

Congressman Young

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