

Data Submitted (UTC 11): 10/24/2019 8:00:00 AM

First name: Chris

Last name: Maynard

Organization: ROTAK Helicopter Services

Title:

Comments: Comments on DEIS, Alternatives to a Proposed Alaska Roadless Rule

Please find attached our comments on the DEIS for the Alaska Roadless Rule.

Best Regards,

Chris Maynard | Director of Business Development

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

October 24, 2019

To whom it may concern,

ROTAK Helicopter Services feels that The Preferred Alternative supporting a full exemption to the national rule is the best approach supporting the State of Alaska's petition for rulemaking and the Purpose and Need statement in which the Forest Service began the process. Further, alternatives that remove Roadless designations in forest development Land Use Designations (LUDs) described in the Tongass Land Management Plan (TLMP) need to focus on "economic acres," not just total acres removed. All forest development LUD acres do not produce economic timber projects and this is a key metric to consider as the analysis of the alternatives are made. Finding and producing enough economic timber sales to sustain the forest products industry is not feasible under the current rule and TLMP.

ROTAK has consistently supported exempting the Tongass from the Roadless Rule. We believe the economic health and longevity of Southeast Alaska would be strengthened if the Tongass were to be removed from the rule and managed as originally envisioned. We believe that tourism, fishing, mining, energy development, and a renewed timber industry can coexist to the benefit of all in the region.

As you know, Alaska and Southeast Alaska are very different than other states under Roadless designations. As a result, a state-specific rule should reflect these differences and unique characteristics. An Alaska-specific roadless rule should allow further road access for not only timber, mineral, tourism, and renewable energy, but access to resources important to residents for subsistence, recreation and other community, economic, cultural, and social activities.

The State of Alaska, the timber industry, and the mining industry continue to support a full exemption from the Roadless Rule in the Tongass. Six Alaska governors, both Republican and Democrat, have requested a total exemption.

In conclusion, ROTAK supports a healthy timber industry and a robust Southeast Alaska economy. This cannot be accomplished without lifting of the federal Roadless Rule in the Tongass. Application of the rule substantially impacts the social and economic fabric of Southeast Alaska and violates the Alaska National Interest Lands Conservation Act and the Tongass Timber Reform Act.

Please select total exemption as the Preferred Alternative in the DEIS. ROTAK Helicopter Services relies on responsible development of resources in Alaska to continue to provide our services and employment to Alaskans.

Best Regards,
Chris Maynard

Chris Maynard

Director of Business Development

ROTAK Helicopter Services

[Attachment is not related to the rule and is part of a signature block, specifically an image of Rotak Helicopter Services icon]

[Position]