

Data Submitted (UTC 11): 12/9/2019 9:00:00 AM

First name: Mary

Last name: Sinker

Organization:

Title:

Comments: The attached Word document contains my full and complete public comment in support of the "No Action" Alternative as stated in the Draft EIS on the Proposed Alaska Roadless Rule, project #54511.

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

Public Comment [ndash]Alaska Roadless Rulemaking #54511

Draft Environmental Impact Statement on the Proposed Alaska Roadless Rule

Dated: Dec. 9, 2019

This public comment is submitted in response to the Draft Environmental Impact Statement on the petition filed by the State of Alaska for an exemption to the 2001 Roadless Rule as applied to US National Forests. This public comment is submitted in support of the [ldquo]No Action[rdquo] Alternative as stated in the Draft EIS.

I am a US citizen and as a public taxpayer have a vested interest in the public lands managed by the US Forest Service for the benefit and enjoyment of everyone. An exemption to the Roadless Rule would set an unacceptable precedent and begin to unravel critical protections for designated roadless areas in national forests, including the Tongass National Forest in Southeast Alaska.

The Roadless Rule as adopted in 2001 works. The Roadless Rule keeps the Tongass intact and healthy by preventing fragmentation of habitat. The Roadless Rule keeps the Tongass intact and healthy because wasteful and unnecessary logging roads that fragment habitat are not permitted. The Roadless Rule works because needed roads to connect communities, access mining claims, hydropower projects and utility corridors are allowed.

The Roadless Rule works. The Tongass National Forest is the largest old-growth temperate rainforest remaining on this planet and as such it is a critical carbon sink combating climate change. The Draft EIS presents no peer-reviewed science that supports shrinking protection of such an important defense against accelerating the pace of climate change.

The Roadless Rule works because it helps to safeguard key old-growth forest habitat for birds like the Queen Charlotte Goshawk [ndash] the Alaskan subpopulation is found only in the Tongass [ndash] and the Goshawk is dependent upon large tracts of unbroken old-growth forest to breed, hunt, and raise young. The Draft EIS presents no peer-reviewed science supporting removal of Roadless Rule protections for the Queen Charlotte Goshawk and other birds, wildlife, salmon and other fish dependent upon clean water and un-fragmented old-growth habitat.

The Roadless Rule works because it is a crucial part of shifting away from long-subsidized logging of old-growth forest in the Tongass and moving toward a more sustainable management approach that capitalizes on the region[rsquo]s globally unique ecology that draws thousands of tourists, hunters, hikers, photographers, and fishermen annually. It is precisely the unique ecology and healthy and wild ecosystem that is the Tongass which makes application of the Roadless Rule especially important for the Southeastern Alaskan tourism and fishing economies that combined together generate \$2 billion in annual revenue and employ 10,000 people in this region(1). In contrast, the antiquated timber management strategy of logging old-growth forest in the Tongass accounts for less than 400 Southeastern Alaska jobs and requires Federal taxpayer subsidies to the tune of more than \$20 million per year (2).

The Draft EIS fails to present any peer-reviewed scientific or economic studies that refute the unprofitability for US taxpayers to expand old-growth logging in the approx. 9 million acres of the Tongass currently protected by the Roadless Rule. Old-growth timber that is harvested in the Tongass is usually exported overseas to be processed. The high cost of harvest and low demand makes it unprofitable to process the timber within the US. The only jobs created are limited local jobs for logging and the added jobs at the processing mills are mostly located outside the US. The US taxpayers should not continue to subsidize old-growth logging in the Tongass. The money being used for these subsidies should instead be redirected to the backlog of watershed projects to enhance the high quality habitat needed by the five species of salmon that are the backbone of the commercial fishing industry in Southeastern Alaska.

Thank you for considering my public comment.

Mary S.

Washington State

Sources:

1. Southeast Conference, [ldquo]Southeast Alaska[rsquo]s Economy[rdquo] (2017), available at <http://www.seconference.org>.
2. Taxpayers for Common Sense, [ldquo]U.S. Forest Service-Tongass National Forest Financials[rdquo], March 16, 2015, available at <https://www.taxpayer.net/article/u-s-forest-service-tongass-national-forest-financials/>.

[Position]

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[Position]