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Organization: State Of Alaska
Title: Representative
Comments: Rep. Josephson comment

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December 11, 2019

USDA Forest Service, Attn: Alaska Roadless Rule

P.O. Box 21628,

Juneau, Alaska, 99802

akroadlessrule@fs.fed.us

Dear Sir or Madam:

I strongly oppose the Forest Service's draft Environmental Impact Statement (DEIS) that proposes to adopt Alternative Six, thereby completely exempting the Tongass National Forest from the Roadless Rule.

The fundamental flaw in the DEIS is what it identifies as the Purpose and Need for the rulemaking: "...the controversy surrounding the management of Tongass roadless areas may be resolved through state specific rulemaking. A long-term, durable approach to roadless area management is desired..."

By selecting Alternative Six, the FS proposes to fully reverse the policy that has been in effect for the last 17 years, during which little controversy arose. Thus, the DEIS's Purpose and Need is based upon a false premise. No need to change the rule exists. A long-term, durable approach to roadless area management has existed for close to two decades.

It is true that the Tongass is unique in the ways the DEIS indicates, but that uniqueness does not necessitate any change in how the roadless rule applies to the Tongass. Paragraphs 2 and 3 of the DEIS's Purpose and Need section do not establish any need. Paragraph 2 vaguely refers to "local economic and development concerns" but doesn't even come close to establishing any purpose or need. Stating, in paragraph 3, what the State of Alaska believes does not establish any need.

The economy of southeast Alaska has adapted to the existing rule. Tourism has displaced logging and sawmilling as economic drivers. Tourists want to see intact, old growth forests and the wildlife that depends upon those forests, not clear-cuts. So, lifting the roadless rule will harm the economy of SE Alaska.

Log storage and transfer facilities degrade or kill benthic habitats, deteriorating sustainable shellfish fisheries. This would undermine the current SE economy. Roads silt streams, and culverts impede salmonid migration, deteriorating sustainable finfish fisheries. This would undermine the current SE economy.

Old growth forests sequester carbon better than new growth, and the need for carbon sequestration increases dramatically as global climate change accelerates.

Given these factors, it makes no sense to lift the roadless rule to enable regression to a former, polluting, harmful, extractive industry that has been superseded by cleaner, more sustainable industries.

The DEIS states that the purpose and need is to resolve controversy about managing roadless areas. Doing a u turn will not resolve controversy. Removing all 9.2 million acres of inventoried roadless acres and converting 165,000 old-growth acres and 20,000 young-growth acres previously identified as unsuitable timber lands to suitable timber lands will not resolve controversy. Facilitating roadbuilding, logging, log rafting, log transfer facilities, stream degradation, salmonid impediment, benthic degradation and carbon release will not resolve controversy. On the contrary, lifting the roadless rule will exacerbate controversy and certainly invite litigation.

Don't do it.

Thank you for considering my comments.

Sincerely,

[signature]

Representative Andy Josephson

[Position]