

Data Submitted (UTC 11): 12/3/2019 9:00:00 AM

First name: Stephen

Last name: Todd

Organization:

Title:

Comments: Roadless Rule comments from Stephen Todd in Wrangell, Alaska

Please see my attached comments for the record regarding the Alaska Roadless Rule.

Thank you,

Stephen Todd

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

Stephen Todd

Wrangell, Alaska 99929

December 3, 2019

USDA Forest Service

Attn: Alaska Roadless Rule

Attn: Secretary Perdue & Chief Christensen

PO Box 21628

Juneau, Alaska 99801

Dear Secretary Perdue and Chief Christensen,

As a resident of Wrangell, Alaska for over twenty years, I am writing to ask that you select the "no-action" alternative on the Alaska-specific Roadless Rule and keep all inventoried roadless areas intact on the Tongass under the 2001 National Roadless Rule.

Wrangell has been pointed to by some as an example of a community that overwhelmingly supports the Roadless Rule being completely dropped. This is simply not true. Wrangell is a community with a much more nuanced view of the National Forest that surrounds us, than some would like to portray. To be frank, the primary voices I hear claiming to speak for Wrangell, stating that the Tongass should have a full Roadless Exemption, are retired politicians and timber industry lobbyists that do not live here.

A thorough census of views in Wrangell would find that a large portion of community members support salmon habitat being protected so that drainages are not degraded by new roads. Our independent tourism businesses here value intact view sheds. Most folks in Wrangell support small, family-run sawmills that operate on the existing road system. I certainly support these small mills, and have been remodeling my home with local, value-added wood for years.

Folks in Wrangell are smart enough to know that exempting the Tongass from the Roadless Rule will lead to a major outcome: an increase in Round Log Export. There are few people in Wrangell that want to see logs leave this island and our region unprocessed. But exempting the Tongass from the Roadless Rule will greatly increase Round Log Export. Small family-run sawmills generally do not have the capital to build new roads. They operate on the existing road infrastructure. The Tongass has over 5,000 miles of existing road infrastructure - much of which is in disrepair due to funding gaps. The large logging companies that export unprocessed logs do have capital to build new roads and will. If the Roadless Rule is exempted from the Tongass, those of us in Wrangell will watch as logs are shipped out of our region unprocessed. Jobs go out with those logs, and we are left with the clear-cuts.

There has been a misinformation campaign in recent years that has stated that the Roadless Rule cuts off communities access to explore for hydropower or other non-timber related projects. This is simply not true. The Roadless Rule was written to limit roads for timber development, and gives allowances for other projects. A reading of the rule will demonstrate this, and those that state otherwise are misinformed at best, and being disingenuous at worst. Since 2009, 48 projects have been approved on the Tongass National Forest in Inventoried Roadless Areas. Most of these projects involved access by roads for the exploration of potential hydropower or mineral resources. The Roadless Rule limits new roads to clear-cuts. It does not limit access for communities.

The Roadless Rule protects undeveloped watersheds that provide habitat for the salmon that we fish for, and the deer that we hunt here in Wrangell. We have many hundreds of miles of forest roads on the Wrangell District alone. One of our small, family-run mills is operating on these roads currently. Many of these roads need significant investment to keep them from degrading and/or restricting fish passage. Why waste federal tax payer money on subsidies for new roads to clear-cuts for Round Log Export when our existing infrastructure is in disrepair?

The current rule is working well for Wrangell and our communities across Southeast Alaska. I urge you to choose the "no action" alternative in this process, and keep it in place.

Sincerely,

[signature]

Stephen Todd

[Position]