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Title:

Comments: See the attached letter.

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John Seward

December 14, 2019

Alaska Roadless Rule

USDA Forest Service

P.O. Box 21628

Juneau, AK 99802

Attn: Ken Tu, Interdisciplinary Team Leader

Sent Via Web: Comment Analysis and Response Application (CARA)

RE: Alaska Roadless Rule, Docket No. FS-2019-0023

Dear Mr. Tu,

I write to you today to make public comment on proposed rulemaking in the matter of the Draft Environmental Impact Statement (DEIS) and the proposed Alaska Roadless Rule. I urge the United States Forest Service (USFS) to the "no action" alternative for the DEIS and the proposed Alaska Roadless Rule (Alternative #1). Keeping the Roadless Area Conservation Rule (Roadless Rule, the current rule) in place in Alaska is essential to the conservation and protection of fish and wildlife habitats and venerable waterways and forests.

My great, great, great, great grandfather is Former Secretary of State William H. Seward. He is widely credited as the leader behind the purchase of the Alaska Territory, Seward's Folly as it was known at the time. His legacy remains across the State of Alaska in the City of Seward, Seward Highway, and the Seward Peninsula just to name a few. What is not so widely known about Secretary Seward is his deep love for the outdoors. He envisioned Alaska to be a wilderness forever and this mission has been rather successful.

Alaska is home to more public lands and wilderness areas than any other state in our great nation. That is because agencies like the USFS has taken a keen interest in preserving the vast lands of Alaska for future generations. The proposed Alaska Roadless Rule goes contrary to everything Secretary Seward would have wanted. On behalf of the entire Seward family we I wish to express our deep opposition to the proposed rule and our steadfast advocacy for the "no action" alternative.

You must also consider the financial burden that the proposed rule will have on the USFS. A report from Taxpayers for Common Sense found that timber sales in the Tongass have come at significant cost to American taxpayers to the tune of \$600 million since 1999, that is roughly \$30 million per year on average with the current Roadless Rule in effect.¹ Taxpayers for Common Sense, "Cutting Our Losses: 20 Years of Money-Losing Timber Sales in the Tongass" (2019), <https://www.taxpayer.net/wp-content/uploads/2019/09/TCS-Cutting-Our-Losses-2019-.pdf>.

The "exempt Tongass" (Alternative #6) is expected to come with an increasing burden on the American taxpayer. All in an effort to prop up already uneconomical logging activity.

The current rule has been quite successful in its protection of America's last remaining undeveloped national forests, all while being flexible for activities like mechanized recreation, mining operations and access roads, fire prevention, and public safety, and the maintenance of connections between communities. The current rule allows flexibility to allow the USFS to accommodate reasonable needs for road building and logging in roadless areas. The USFS has approved all 58 projects that have been proposed in Tongass roadless areas since the Roadless Rule went into effect.

The Tongass has the least economically efficient timber sale program in the National Forest System. This is due to high road building and transportation costs, lack of sawmill capacity, and low timber values. Maintaining the current rule will save taxpayers millions of dollars by preventing costly new road building. Road construction costs on the Tongass average \$185,000 per mile, with maintenance and repair costs averaging \$50,000 per mile.²

These costs are mostly absorbed by the USFS, which has a \$3.2 billion maintenance backlog resulting from its massive 371,000-mile road network. We don't need to add more road costs and maintenance costs to this already huge backlog. We got to fix what we have now before we build anything new.

The Tongass contains some of the largest remaining tracts of temperate old-growth rainforest in the world, helping make it the country's single most important national forest for carbon storage and climate change mitigation. The forest holds about 650 million tons of carbon, representing roughly half of 2017 U.S. carbon dioxide emissions from the electric, industry, transportation, agriculture, and commercial/residential sectors.³ Carbon stored in the Tongass makes up about 11 percent of the carbon currently stored in U.S. forests.⁴

If the proposed rule takes effect much of this stored carbon will be released into the atmosphere. The Tongass can continue to be a low-cost part of our country's response to climate change.

² Alexander, S.J, Dr., Henderson, E. B., & Coleman, R. (2010). Economic Analysis of Southeast Alaska: Envisioning a Sustainable Economy with Thriving Communities [Abstract]. Forest Service Alaska Region, p. 1-98

³ Tongass National Forest. Draft Environmental Impacts Statement Rulemaking for Alaska Roadless Rule, Forest Service Alaska Region p. 3-124, section Carbon Storage Aboveground.

⁴ Forest Service Alaska Region

I echo the concerns of Joel Jackson the President of the Organized Village of Kake Tribal Council who spoke before Congress last week. "Because these ancestral homes...my ancestors walked on that land...So many people depend on things other than mining and logging, like fishing, like tourism. Those are going to be the most important things to our region, plus our way of life as tribes...Without it, we're going to lose our culture. We cannot afford to have any more devastation in our homelands." Though President Jackson's ancestors were in Alaska

far before mine, I can't ever imagine that Secretary Seward who walked the lands of Alaska and was a strong advocate Native American rights would ever stand for a time when the government would cast aside the local tribes way of life for no other reason than to make more money. We have to stand for something and this not it.

Two-thirds of Alaskans oppose the proposed rule.⁵ This proposed rule lifts the protection of 9 million acres of the Tongass - nearly 40 percent of the remaining intact forest landscape left in the country. 25 percent of the wild salmon from West Coast are hatched in Tongass waters⁶, by opening the forest to logging you would immediately threaten their ability to spawn in the forest's freshwater streams.

The proposed rule gives the Regional Forester the ability to remove Roadless Rule protections from any of the currently protected 5.4 million acres in the Chugach National Forest, with no analysis of impacts. This is just more evidence that the USFS does not care what happens to the lands they are responsible for managing as long as their buddies in the logging industry can make money. Recent press reports quote the USFS Deputy Chief as saying they have orders to exempt Alaska from the Roadless Rule.⁷

This process has been rushed from its very onset and the rules would have already been changed if not for federal regulations requiring an environmental impact study and a public comment period. The DEIS recommends six alternatives, one is do nothing, one is roll it all back and then there are four others that recommend less drastic rule changes. Why were these alternatives never given any consideration?

5 Trout Unlimited and Brunner, K. (2019). Poll Findings: Alaska Tongass Forest.

6 Tongass salmon Factsheet (2019) Forest Service Alaska Region

7 Michael Penn, Residents Show up for Roadless Rule Meeting, Juneau Empire, November 5, 2019, <https://www.juneauempire.com/news/photos-residents-show-up-for-roadless-rule-meeting/>

The USFS has been stonewalling this whole time. My repeated attempts to gain more information from USFS scientists have gone unanswered. My emails do not get reply's, my phone calls do not get returned. I am a tax-paying American. A reply to my legitimately founded concerns is not unreasonable. I expect someone will take the time to reply to this letter.

It is critical that Alaska's national forests be managed in a fiscally responsible way. Timber harvesting on national forests is a viable multiple-use activity, providing jobs and producing valuable products. However, from an economic and environmental standpoint, we cannot justify opening up more roadless areas. It will only worsen our climate crisis and will endanger these sacred lands. Keeping the Roadless Rule intact will safeguard the government from incurring needless debt, align the Tongass' management direction with the realities of Southeast Alaska's commercial trends, and help fight climate change. It will protect the lands for future generations and preserve the way of life for many indigenous peoples, who have been on these lands for far longer than any of the rest of us. Conservation and preservation are what Secretary Seward envisioned for Alaska all those years ago.

While speaking of America's great forests, President Reagan once said, "This is our patrimony. This is what we leave to our children. And our great moral responsibility is to leave it to them either as we found it or better than we found it." It is our moral obligation to ensure the protection of these lands for future generations.

I oppose the proposed rule, so does my family, the Kake Tribe and two-thirds of the Alaska people. This is a no brainer the people don't like it so don't do it.

Thank you for considering my request that the Forest Service pursue a fiscally responsible,
environmentally sound course of action by selecting Alternative #1, the "no action."

I look forward to your response.

Grateful,

[signature]

John Seward

CC: The Hon. Sonny Perdue, Secretary of Agriculture
The Hon. Lisa Murkowski, United State Senator, Alaska
The Hon. Dan Sullivan, United State Senator, Alaska
Vicki Christiansen, Chief, United States Forest Service

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