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Organization: The Center for Earth Jurisprudence
Title: Director
Comments: December 15, 2019

USDA Forest Service

P.O. Box 21628

Juneau, Alaska, 99802

Re: Alaska Roadless Rulemaking #54511

Dear Secretary Perdue:

I am writing to support the No-Action Alternative for the Draft Environmental Impact Statement on the proposed Alaska Roadless Rule, Alternative 1. I support keeping the current Roadless Rule protections in place and intact for the Tongass National Forest, which exists within the traditional territories of the Tlingit, Haida, and Tsimshian peoples. The Tongass is the world's largest intact temperate rainforest and has been called "America's Climate Forest" as it is the single most important national forest for carbon sequestration and climate change mitigation in the United States.

Despite the request by Alaskan Congressional members to exempt the Tongass Forest from the 2001 National Roadless Rule, the protection of over nine million acres of the ancient old-growth forest, through the continuation of the Roadless Rule, is essential to protecting not only the Forest but multitude of ecological and cultural benefits it provides.

The Roadless Area Conservation Act of 2019 aims to prevent logging and destructive road building in the Tongass National Forest and bars the Department of Agriculture from allowing the construction of roads, the reconstruction of roads, or logging in an inventoried roadless area where those activities are prohibited by the Roadless Rule.

The exemption of the Tongass National Forest from the Roadless Rule in order to permit more logging would potentially affect 9.5 million acres of land. This comprises of forty-percent of the remaining intact forest landscape managed by the United States Forest Service in the country.

The Tongass National Forest is the nation's largest forest and it is part of the largest intact temperate rainforest on Earth, prized for helping the climate by storing huge amounts of carbon. It is a habitat for many animals, including eagles and spawning salmon. Its big trees also provide a critical home for brown bears, Sitka black-tailed deer, a bird of prey called Goshawk, etc. It is also home to approximately 70,000 people and facilitates the primary industries of commercial fishing, tourism, and recreational jobs, bringing in approximately \$1 billion dollars annually to Southeast Alaska's economy. The salmon industry is vital to Alaska, bringing in approximately \$986 annually. About forty-percent of salmon that travel down the west coast of the country spawn in Tongass, bringing with them nutrients that help sustain the forest growth, and these intact strands of trees keep the forest cool and trap important sediment.

The Forest Service Plan can also affect the rest of Alaska by threatening the Chugach National Forest, as the proposal allows the agency's chief forester the authority to remove the Roadless Rule protections from the 5.4 million acres of forestland without analyzing impacts and with only a public comment period of thirty days. Preserving the roadless areas include benefits such as protecting water sources in 661 of the over 2,000 major watersheds in the nation, and providing undisturbed areas for hunting and fishing, while preserving the area for the various wildlife that exist, including the salmon that contribute drastically to the country's seafood economy. About half of southeast Alaska's old-growth forest has already been harvested, and this logging proposal will attempt to remove even more of the forest, destroying two of Alaska's biggest economic contributions, the tourism and seafood economy, which is responsible for approximately twenty-six percent of the local economy.

Alaskan residents are exceedingly against the proposed logging, with two-thirds of voters in the area opposing the logging or wanting the logging to take place only in areas previously and already permitted. On a national level, seventy-five percent favor the Roadless Rule, with seventy-seven percent among rural residents. A great majority of the 140,000 public comments that were submitted after the state of Alaska petitioned the White House were in support of the Roadless Rule. Both Republican and Democratic lawmakers have praised the rule as an effective way to preserve important lands.

Indigenous tribes have also argued against a full exemption of the Roadless Rule in the Tongass. The Organized Village of Kake, the Tlingit-Haida Central Council, which is comprised of sixteen southeast tribes, and the Angoon Community Association in southeast Alaska signed a letter to Secretary Perdue, asking that the Forest Service maintain current protection for Southeast Tribes' "customary and traditional use areas," which are their customary areas to hunt and gather medicines from the forest. The Affiliated Tribes of Northwest Indians and National Congress of American Indians also passed resolutions asking that Roadless Rule remain in effect.

These projects have proven to be uneconomic, taking years to receive permits and ending up being too costly to complete. There is also a tariff imposed to export logs to China, who will inevitably be a major customer of these projects. Taxpayer for Common Sense have reported that timber sales in the Tongass Forest have already cost taxpayers nearly \$600 million over the past two decades because "the costs incurred by the Forest Service to administer its timber sales program have far surpassed receipts generated from the resulting sales." It is predicted that these costs will only increase over time if the Roadless Rule is eliminated, "due to the high, taxpayer-subsided costs of building and maintaining roads in these remote areas." Additionally, the federal government believes that the money is to be made from logging, but agency officials in Alaska seemed to have

come to the realization that "the golden goose is the salmon, not the trees." Focusing efforts in cultivating the natural wildlife that the area has to offer may prove not only more beneficial for nature and people utilizing the area, but also cost-efficient.

I urge you and the Forest Service to protect over 9 million acres of forest, defend our global climate, and stand with Indigenous and local communities by keeping the National Roadless rule intact and selecting the no-action alternative for the Draft Environmental Impact Statement on the proposed Alaska Roadless Rule, Alternative 1.

Sincerely,

Margaret R. Stewart, Esq., MPA, LL.M.

Director

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