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Comments: See attached file(s)

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December 13, 2019

The Honorable Sonny Purdue
Secretary of Agriculture

U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

RE: Support for Full Exemption of the 2001 Roadless Rule in the Alaska Tongass

National Forest

Dear Secretary Purdue:

McFarland Cascade Holdings, Inc., ("McFarland") strongly supports full exemption of the Tongass National Forest from the 2001 Roadless Rule as the Preferred Alternative in the Draft Environmental Impact Statement ("DEIS") rulemaking process.

Since 1916, McFarland has been manufacturing and distributing quality utility poles in North America. The utility industry depends on our wood poles for delivery of electricity and telecommunication services. Western Red Cedar is a preferred species of pole for utilities, because of its unique natural durability and ease of climbing and installation for line crews. Historically, the U.S. timber supply for Western Red Cedar came from Idaho, Washington, Oregon and Alaska. That supply has sharply declined because large parts of the federal working forest were designated as "Roadless Area." As it stands now, roads which would provide access to historical timber harvest levels in Alaska are not allowed. The Roadless Rule has been disruptive to pole supply from Alaska. The timber industry, which once was 4,200 jobs strong in Southeast Alaska, is now reduced to one medium-sized sawmill and 300 jobs, despite the strong demand for Western Red Cedar in the Lower 48.

From a maintenance of U.S. infrastructure perspective, there is a real need for an adequate timber supply for utility poles. Recent hurricanes in the south and east coast, and forest fires in the west, have applied pressure on wood pole supply. Part of restoring infrastructure includes replacing damaged power and telephone lines.

According to the U.S. Forest Service, the impact of full exemption of the Tongass National Forest from the 2001 Roadless Rule is minimal compared to the economic benefits derived from full exemption:

The proposed rule would effectively bring only 185,000 acres (~2%) out of 9.2 million designated as inventoried roadless areas on the Tongass National Forest into the set of lands that may be considered for timber harvest.... That modest addition of suitable timberlands would allow local managers greater flexibility in the selection and design of future timber sale areas. This improved flexibility could, in turn, improve the Forest Service's ability to offer economic timber sales that better meet the needs of the timber industry and contribute to rural

economies.

Fed. Red. Vol. 84, No. 201, Oct. 17, 2019 at 55524. McFarland agrees with the Forest Service's statement. Much of the timber in the Tongass can be a resource for rebuilding infrastructure, while minimizing the impact in the region.

Keeping America's infrastructure working is a job we take very seriously. Full exemption of the Tongass National Forest from the 2001 Roadless Rule not only provides economic growth to rural communities, but it also ensures a stable source of timber to supply much needed utility poles and pilings to support essential public infrastructure.

Respectfully Submitted,

[signature]

Jon Younce

Vice President, US Fiber & Pole Production
McFarland Cascade

[Position]