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Organization:

Title:

Comments: Tongass National Forest Roadless Rule Exemption

Dear USDA:

Attached is my letter encouraging exemption of the Tongass National Forest from the Roadless Rule.

Sincerely,

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

To: Alaska Roadless Rule

USDA Forest Service Alaska Region

Ecosystem Planning and Budget Staff

PO Box 21628

Juneau, Alaska 99802-1628

16 December, 2019

Greetings,

I am an 11-year resident of Ketchikan engaged in business and economic development. In my years in Ketchikan, I have labored in developing new industry and businesses that can invigorate the economy that slumped during the decline of the forest products industry from the late 1990s until now. While I espouse conservation of resources and a beautiful landscape that attracts the visitors who support the new economy, I also believe that a well-planned forest products industry can coexist with and enhance a healthy forest environment. A completely roadless forest is inaccessible to almost everyone. Without some management, the forest rots from within from lack of sunlight and overgrowth. We hear from proponents of the roadless rule that exempting the Tongass National Forest from the roadless rule will result in vast swaths of clear cuts which will ruin habitat and threaten their subsistence lifestyle. I have never heard one fact supporting these claims, nor any

scientific studies. The arguments in opposition to exemption are all speculation and emotion.

Therefore, I am writing to request that the Tongass National Forest be completely exempt from the Roadless Rule. My reasons align with those of the Ketchikan Chamber of Commerce's November 2019 letter, which I incorporate herein by means of reference.

In its 2003 Rulemaking USDA totally exempted the Tongass from the Roadless Rule because:

The Department has concluded that the social and economic hardships to Southeast Alaska outweigh the potential long-term ecological benefits because the Tongass Forest plan adequately provides for the ecological sustainability of the Tongass. Every facet of Southeast Alaska's economy is important and the potential adverse impacts from application of the roadless rule are not warranted, given the abundance of roadless areas and protections already afforded in the Tongass Forest Plan.

USDA's substantive, policy determination has never been challenged and is as true today as it was then.

As a resident of southeast Alaska, I understand that the long-term economic viability of my community and others throughout the region is intrinsically linked to how the Tongass National Forest and its resources are managed. It is essential that the Tongass be managed in a responsible manner that balances diverse stakeholder needs, so that the region can enjoy the benefits of a diversified economy. This has grown particularly important in recent years due to the State of Alaska's financial limitations brought about by lower levels of oil revenue.

Southeast Alaska is host to very diverse and sometimes diverging interests. The 17-million acre Tongass National Forest (the size of West Virginia) is certainly large enough to satisfy all reasonable stakeholder interests, including key conservation objectives. As the Ketchikan Chamber of Commerce's letter to the USFS points out, there are a great many needs and opportunities that require assured road access in order to be technically feasible and economically viable, such as:

- * Access to minerals, including rare earth elements of national strategic importance, and geothermal energy sources.
- * Interconnection of communities, consistent with Transportation Utility System corridors identified in the Southeast Alaska Transportation Plan.
- * Access to new hydropower and renewable energy resources, and development of new transmission facilities.
- * Interconnections of communities with water resources, renewable energy resources, sanitary landfills, subsistence resources.
- * A timber supply that can ensure the long-term presence of a viable timber industry.

Roads also support enjoyment of southeast Alaska's natural qualities; the road systems created by the timber industry are the primary means of accessing the Tongass for recreational and subsistence activities.

I support certain recommendations for the assurance of road access and the ability to cut timber, renewable energy development, and community enhancement set out in the attached Citizen Advisory Committee (CAC) Report. The CAC was appointed by Governor Walker to inform the State's participation as a cooperating agency in the NEPA process associated with the rulemaking. Specifically, I urge USDA to include the following language in each of the alternatives 2 - 5 of Exhibit G: CAC Recommendations 8 - 16 for exceptions to 36 C.F.R. Sec. 294.12 found at pages 7 -8 of the attached Report; and CAC Recommendations 1 - 8 for exceptions to 36 C.F.R. Sec. 294.13 found at pages 8 -10 of the attached Report;

While direct jobs within natural resource industries may appear modest, the associated indirect and induced expenditures and employment are extraordinary. Virtually every private enterprise benefits from the presence of timber, mineral, and energy development - from transportation companies, to consulting environmental technicians, to grocery and hardware stores, to construction companies, to real estate, and more. Additionally, communities benefit through payment of property taxes (by both businesses and their employees), contributions to non-profit organizations, the existence of family-wage jobs, and retention of young people.

For these reasons and others outlined in the Ketchikan Chamber of Commerce's letter, I hope the USFS will please take action to end imposition of the Roadless Rule within the Tongass National Forest.

Signed,

[Position]