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

o: Alaska Roadless Rule

USDA Forest Service Alaska Region

Ecosystem Planning and Budget Staff

PO Box 21628

Juneau, Alaska 99802-1628

19 November, 2019

Greetings from the Greater Ketchikan Chamber of Commerce. We are a diverse community-based organization comprised of over 280 members, including private sector businesses, non-profit organizations, and local governments. Our member-businesses include some of the largest employers in southeast Alaska, as well as the State of Alaska, which provide family-wage jobs to thousands of Alaskans. The Ketchikan Chamber brings businesses, investors, and customers together, and work towards the common goal of encouraging a sustainable economy which can preserve the socioeconomic well-being of our community, and the families who call it home. The Chamber represents business of all types - tourism, commercial fishing, sports fishing, mining, timber, transportation, and energy - and believes that a very broad diversity of businesses can coexist and share increased access to the Tongass without producing harmful effects upon one-another.

For years, the Ketchikan Chamber of Commerce's Board of Directors has taken the position, in support of our diverse members' interests, that the Tongass National Forest must be completely exempt from the Roadless Rule. The Chamber continues to hold this position to this day.

The Chamber represents businesses of all types, and believes they can share increased access to the Tongass without producing harmful effects upon one-another. Our organization has noted a disturbing trend in recent public comments and advocacy where groups with a narrow focus pit one resource or industry against another - for example, playing fishing or tourism against timber.[1] This logic is incredibly flawed, and ignores many of the excellent synergistic benefits which different industries and user types can create for each-other. The majority of tourists visiting southeast Alaska are visiting communities which were constructed and sustained by natural resource-based industries. Without these industries, there would be very few (if any) communities for tourists to visit. Visitors and outdoor enthusiasts rely heavily upon roads constructed by the timber industry to access and enjoy the Tongass National Forest. Recreational and subsistence hunters utilize logging roads to access streams

and habitat. Sports fishermen and guides utilize roads constructed by the timber industry to access world-class fishing opportunities. There are also various examples of small hydropower projects coexisting with hatcheries in order to provide clean energy, while enhancing salmon stock.[2] Renewable energy projects frequently are required incorporate recreational benefits and enhancements, such as public access trails. The USFS has an excellent opportunity to facilitate creation of these synergistic benefits by diversifying and harmonizing user types within the Tongass without the restrictions of the Roadless Rule.

The Ketchikan Chamber of Commerce filed numerous formal comments, suggestions, and formal Objections during 2016 TLMP Amendment process. http://www.ketchikanchamber.com/2016-tlmp-comments We do not believe the 2016 Plan Amendment which resulted addressed our concerns, the needs of the Ketchikan community, the needs of southeast Alaskan communities where many of our members invest and do business, or the region's timber, mining, and energy businesses.

It is important to understand that - as noted in the Forest Service's Notice of Proposed Rulemaking - Total Exemption is only anticipated to restore 185,000 acres of forest land to the timber base to support an economic and sustainable timber industry; the remaining 9 million acres of the Tongass would be available for other purposes. [3] This modest land base will help sustain the 350 people with direct jobs in the timber industry, and as well as numerous businesses and jobs within a diverse supply chain, and the families they support.[4]

The benefits of total exemption go far beyond the timber industry, and will also support economic development and community sustainability in various other areas:

1. mining laws (30 U.S.C. [sect] 22 et seq.) for operators meeting the requirements of 36 C.F.R. Part 228. This is the same process for obtaining road access to mineral operations on non-IRA National Forest lands;
2. Allowing the cutting and removal of trees associated with mining exploration and development. Currently, 36 C.F.R. [sect] 294.13(b)(2) only authorizes the cutting or removal of trees in IRAs that is "incidental to implementation of a management activity not otherwise prohibited by this subpart." The level of exploration needed to develop a mine on the Tongass requires the cutting and removal of trees. Mine development would requires even more cutting and removal of trees. Total Exemption would eliminate this barrier to mining;
3. Assuring road access to leasable minerals (such as geothermal resources) if the operator meets the criteria of 36 C.F.R. Part 228;
4. Roads in Transportation Utility System (TUS) corridors identified in the Southeast Alaska Transportation Plan (SATP) for development and/or essential for reservation for the connection of communities and development of the regional transportation system would be permitted.
5. Assuring access to new hydropower and other renewable energy projects and transmission infrastructure, including their maintenance. The current language in the 2001 Roadless Rule is ambiguous with respect to new hydropower sites. Renewable energy includes sunlight, wind, rain, tides, waves, geothermal heat, biomass, and other forms of energy.
6. Allowing road access to Congressionally-authorized Southeastern Alaska Intertie System Plan Routes (PL 106-511, February 1, 2001) as identified in report #97-01 of the Southeast Conference.
7. Allowing roads included in a community, municipal, or tribal government plan to provide access and development of water resources, renewable energy resources, sanitary landfills, connecting isolated road networks, and subsistence resources, including maintenance of such roads and facilities.
8. Allow road access to an authorized facility or location for fishery research, management, enhancement and rehabilitation activities; fishways, fish weirs, fish ladders, fish hatcheries, spawning channels, stream clearance, egg planting, and other permitted aquaculture facility or activity, including mariculture.

Timber and minerals are global commodities; if demand is not met by the Tongass, it will be met by a supply from other sources. Oftentimes, the alternate sources are countries with much lower safety and environmental standards, or that may not actively promote regrowth as is done in the United States. From a global carbon perspective, there is no environmental benefit from shifting harvest of a tree in one part of the world to another. In fact, there are oftentimes greater environmental and social costs associated with obtaining commodities abroad. Roadless areas of the Tongass are also host to rare earth elements which the US has relied upon China for, due to their necessity in a wide range of technologies required for renewable energy and defense industry applications. A domestic source of strategically critical minerals is vital to our nation's economic security and national defense.

The often-stated belief that failing to develop the Tongass's natural resources somehow enhances environmental quality and creates social benefits for the US, and the world, is extremely logically flawed. Failing to develop our own resources simply shifts the location of where resource development occurs - and with it, where jobs are created. Extending the life of a tree in the Tongass simply means a tree will be cut sooner elsewhere. Leaving minerals in the ground in Alaska means that they will be extracted in a different location. Failing to develop new renewable energy resources means that energy needs will be met by alternate sources - which may require significant use, extraction, and processing of fossil fuels. Failing to develop our resources means we will be paying others for their resources, and providing others with jobs at our own cost. Relying upon countries like China for strategically critical rare earth elements when we could be accessing them in roadless areas of the Tongass places our national defense and renewable energy capabilities in the hands of a foreign government which does not have America's best interests at heart.

The Tongass National Forest comprises over 17 million acres, which provides tremendous opportunities for the USFS to increase job creation, energy security, and strategic mineral production benefits for the US while also actively supporting conservation. However, to do that, USFS must exempt the Tongass from the Roadless Rule, and align management practices with federal policy to an increased extent.

Failing to sustainably develop our own, abundant resources in a sustainable and responsible manner is directly contrary to federal policy prioritizing domestic supply of renewable energy and strategically critical minerals - priorities which have bene highly held by democratic and republican administrations alike. We hope you will agree that total exemption is appropriate and necessary for the Tongass National Forest.

Sincerely,

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Chelsea Goucher

President, Ketchikan Chamber of Commerce

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Carrie Starkey

Executive Director, Ketchikan Chamber of Commerce

cc: President Donald J. Trump

Secretary of Agriculture Sonny Perdue

Senator Lisa Murkowski

Senator Dan Sullivan

Congressman Don Young

Governor Michael Dunleavy

[1] This is especially prominent lately due to recent low salmon returns, which, we note are occurring at a time when timber and mining activities within the Tongass are at a 100-year low.

[2] Consider the Whitman Lake project, or the Neets Bay hatchery, which utilizes a small hydropower project.

[3] The middle column on page 55524 of the Forest Service's Notice of Rulemaking states: The analysis set out in the DEIS indicates that removal of regulatory roadless designations and prohibitions on the Tongass National Forest would not cause a substantial loss of roadless protection. The proposed rule would effectively bring only 185,000 acres ([sim]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. When examined in 2016, the Forest Service projected that only 17,000 acres of old-growth and 11,800 acres of young-growth might be harvested over the next 100 years. That modest addition of suitable timber lands 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. Despite the proposed regulatory exemption, the remaining 9 million acres would not be scheduled or expected to be subject to timber harvest activities.

[4] The timber industry supply chain includes includes transportation services, utilities, marine logistics, engineering and professional services, construction, equipment rental, and more.

[Position]