Data Submitted (UTC 11): 12/15/2019 9:00:00 AM
First name: Allen
Last name: Smith
Organization:
Title:
Comments: Submission of Comments on Alaska Roadless Rule DEIS

USDA Forest Service

Attn: Alaska Roadless Rule

P.O. Box 21628

Juneau, Alaska 99802

Dear U.S. Forest Service:

Please find my comments submitted to the record on the Alaska Roadless Rule DEIS attached as a WORD document and acknowledge receipt of these comments as received within the deadline.

Thank you, Allen E. Smith

Allen E. Smith

Olympia, WA 98502-3434

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

USDA Forest Service Attn: Alaska Roadless Rule P.O. Box 21628 Juneau, Alaska 99802

December 14, 2019

RE: ALASKA ROADLESS RULE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear U.S. Forest Service:

Thank you for the opportunity to comment on the Alaska Roadless Rule Draft Environmental Impact Statement (DEIS).

SUMMARY STATEMENT

I strongly support adoption of the No Action Alternative to leave the Alaska Roadless Rule as it is. I categorically oppose any of the other listed Alternatives in the Alaska Roadless Rule DEIS or any other Alternative that would diminish the protections to the Tongass National Forest afforded by the current Alaska Roadless Rule. It is deeply disappointing that the U.S. Forest Service, USDA (USFS) has reopened this critical issue that has long been settled through an enormous outpouring of local and national public comment and extensive litigation. Timber production is not a major part of Southeast Alaska's economy and at its previous unsustainable heights seriously damaged the wild natural forest preserves and intact ecosystems that sustain and support the majority of this region's economy. USFS should resist a return to those excessive timber harvest levels, listen to the vast majority of citizens locally and nationally who oppose them, and select the No Action Alternative to leave the Alaska Roadless Rule intact as is.

ANALYSIS

The Inventoried Roadless Areas of the Tongass National Forest are an international rainforest treasure that took thousands of years to evolve into what they are today. These forests provide a sustainable natural resource base of diverse ecosystems, wildlife, and anadromous fisheries that support subsistence hunting and fishing, sport hunting and fishing, commercial fishing, tourism, and the local economy. Further, these forests are the major intact remnants of an enormous temperate rainforest unlike any other on earth that uniquely provide a major source of carbon sequestration that should be kept as is to help confront climate change. These values are irreplaceable.

The Tongass National Forest has already had significant portions of its old growth trees removed over several decades of excessive logging at a rate that was at times five times the rate of forest regeneration. There is now a major transition under way to a more sustainable rate of timber harvest from second growth timber outside Roadless Areas that is being integrated into the economy of Southeast Alaska and should be allowed to continue.

The Purpose and Need Statement fails to adequately justify any proposed Alternatives for changing the Alaska Roadless Rule on the Tongass National Forest and shows that all proposed actions are driven solely at the request of the State of Alaska. Similarly, the Key Issues are all focused on returning to previous unsustainable levels of timber harvest on the Tongass National Forest. That determination can be readily concluded from the USFS selection of Alternative 6 as the Preferred Alternative, an alternative that is not even thinly disguised in its design to totally eliminate the Alaska Roadless Rule and would allow resumption of timber harvest at any level they wish to choose.

The history of timber harvest on the Tongass National Forest has proven that it has the capacity to destroy the wild natural values of the forest that sustain the majority of employment and local economic sectors. Timber harvest should be compatible with those other local economic sectors and not be allowed to damage them as it has in the past. The Alaska Roadless Rule has allowed a stability to be achieved in Southeast Alaska's economy and the transition to a sustainable second growth timber economy to emerge in place of the unsustainable past levels of timber harvest.

CONCLUSION

I strongly urge the USFS to leave the Alaska Roadless Rule intact and select the No Action Alternative and I strongly oppose all other Alternatives. The Tongass National Forest is too valuable to the nation and the local economies that it sustains to reopen it to harvesting its ancient forests.

Again, thank you for the opportunity to comment on this critical issue. Please inform me of your decision.

Sincerely,

signed

Allen E. Smith

Allen E. Smith has over forty years of Alaska lands conservation experience, and served The Wilderness Society as Vice President (1986 to 1989), Alaska Regional Director and Senior Policy Analyst (1989 to 2004), and Consultant (2004 to 2006). He previously served as President and CEO of Defenders of Wildlife (1982 to 1986) and as Executive Officer in the Land & Natural Resources Division, USDOJ (1979 to 1982).

[Position]