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First name: Wade

Last name: Johnston

Organization:

Title:

Official Representative/Member Indicator:

Address1: 624 John Fremont Dr

Address2:

City: Reno

State:

Province/Region:

Zip/Postal Code: 89509-1409

Country: United States

Email: wadejohnston0@gmail.com

Phone:

Comments:

This request for comment is quite broad and undefined in it's scope so it's difficult to provide any pointed advice here. One thing I find to be very disappointing about mineral permitting in USFS is the degree to which the permit applicants are at the mercy of the subjective biases of the USFS officials administering the permits at the ranger district level.

It's nice when their biases loosely align with your own and equally not nice when they don't. More importantly though, their biases are 100% irrelevant to the purpose of permitting and allowing a system where that has one iota of influence is inappropriate. Example: a recent case I'm aware of involved a more senior USFS official who happened to be taking a recreational trip to an area in a FS area and heard a chainsaw running in an area where a group was permitting for this activity but restricted to only cutting growth of 2" or less in diameter. The official thought that he heard, from about a mile away, a chainsaw running longer than would be necessary to cut 2". This flimsy "evidence" was all that it took to cause problems for the group conducting the work.

There needs to be objective standards followed in NOI and POO permitting and oversight and accountability up the chain to ensure that they are followed. Per many things with the federal govt, the current system allows for what should be scientific endeavors to be politicized. Not only is this wrong and does a disservice to the citizens which the laws are supposed to serve but I have seen this attitude brew contempt for USFS officials in the communities where they live, in one case to the point where they limit their involvement in the community or don't tell people where they work.

Another issue that needs addressing is the Roadless Rule. Applying a broad set of regulations to over 50 million acres across many states is an obvious oversimplification of the needs of the specific areas to which the rules apply.

Specifically, the Roadless Rule has not worked well for Southeast Alaska. This is a rural area with isolated communities that depend on timber and mining. These industries have been stifled and, in many cases eliminated, since this law has been forced on them. Their concern is working, jobs, proliferation for them and their families, and they don't have the ambivalence towards resources extraction that the privileged bureaucrats thousands of miles away have. Washington wants Alaska to be their bucolic and pristine vacation wilderness area but the fact is that this is home to three quarters of a million people who aren't living in igloos and spearing their food, they need jobs and homes and the materials that provide a comfortable life, materials that are provided by timber and minerals.

The State of Alaska has tried to rid themselves of the Roadless Rule many times now, with some success but ultimately to be shut down with the condescending and forcibly paternalistic implication that Washington knows what's best for them. I know that this issue of getting an exemption for the Tongass NF from the Roadless Rule has recently been raised again and I urge USFS officials to have mercy on this region and their right to self-governance.