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Organization:

Title:

Comments: I am writing to you today as a resident of Ketchikan and resident of Alaska to express my opposition to the preferred "full exemption" alternative as delineated in the Roadless Rule Draft Environmental Impact Statement. I am principally opposed to the selected alternative for a multitude of reasons.

First of all, I do not believe that the value of unharvested land to the tourist industry was accurately calculated and weighed as part of the rulemaking process. The tourism industry relies on a public image of Southeast Alaska as being pristine, untouched wilderness. If the first thing that cruise ship visitors see upon entering Southeast Alaska is clear cuts, dilapidated logging roads, and other ugly scars of the timber industry, the image they have of Alaska will be burst. Additionally, if increased roadbuilding threatens the water quality of anadromous streams, it may impact our salmon stocks, which support both our tourism and fishing industries. The tourism and fishing industries are crucial to our economy in Ketchikan, while the timber industry is dead, and has been for decades. Because of this, I wish that the Forest Service had prioritized the environmental protection needs of the tourism industry over the extractive needs of the timber industry.

Furthermore to this point, it is noted in the DEIS that "recreation and tourism is not classified or measured as a standard industrial category. Components of travel and tourism are instead partially captured in other economic sectors. Because tourism, which is the major driver in Ketchikan, cannot be classified or measured as a standard industrial category like mining, timber, or energy, I am concerned that the economic value and jobs it creates are not being adequately considered as part of the federal rulemaking process.

Additionally, according to the State of Alaska's own economic reports, Tongass timber is uncompetitive because of permanent and fundamental changes in the global timber market. Today, the Tongass timber industry supports less than one percent of jobs and earnings in Southeast Alaska. The era of mass timber production in the Tongass over, and the era of mass tourism is here. Therefore, our federal government should be crafting policy to protect the majestic viewsheds, productive fish habitat, and pristine old growth forests on which our tourism industry relies.

I am also opposed to the proposed rule because I believe that it does not provide adequate environmental protection for the Tongass National Forest. I understand that the rule will not change annual timber yields, stream buffers, 2016 Forest Plan Amendment, CWA regulations, or other previously existing environmental protections, but the fact that it opens up 9.2 million more acres for road development and 195,000 additional forest acres to additional harvest is enough cause for concern because I and many other Alaskans do not trust the Forest Service to protect these lands from overharvest, habitat destruction, or other toxic byproducts of the timber industry.

Even if every road and timber project that will occur in these acres is subject to NEPA review before approval, I

do not trust the Forest Service to adequately carry out this review because time and time and time again the Forest Service has chosen to prop up the destructive and dying timber industry instead of implementing needed environmental protections that are necessary to secure our fishing and tourism livelihoods.

Additionally, I am not satisfied with the way this rule was promulgated and planned. The president should not excise undue influence upon the decisions made by the USDA or the US Forest Service at the request of the state governor, as happened in the case of Governor Dunleavy pressuring President Trump to fully exempt the Tongass National Forest.

While Alternative #1 is my preferred alternative, Alternative #3 seemed like a fair, compromising pick that would satisfy both timber companies and environmentalists. I would recommend that Secretary Perdue choose this "compromise alternative" as part of a good faith effort to placate both Alaskans in support of a full exemption and Alaskans in support of the no action alternative.

I also oppose the rule because I believe that consultation with native tribes did not occur to the standards set out in Executive Order 13175, and because of this the rulemaking process is incomplete and the draft environmental statement issued in fall 2019 should thus be considered incomplete and an inaccurate representation of the economic, political, and social needs of the Southeast Alaskan population.

Additionally, taxpayers have lost over \$1.5 billion subsidizing Tongass clearcut logging. The proposed full exemption would only exacerbate a wasteful, money losing timber program while important tourism infrastructure such as parks and cabins go into disrepair because of a lack of funds available for maintenance. Please consider other industries besides just the dying/dead timber industry.

Finally, if Alternative #6 is selected as seems likely, I hope that every effort will be made to hire Alaska Natives as crewmembers to conduct harvests in the newly opened up acreage.

Thank you for your consideration, and I hope that Alternative #6 is not selected as the final rule and that either Alternative #1 or #3 is selected in its place.

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