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Comments: I am a 43-year resident of Alaska and have lived in Southeast Alaska for 27 of those years.

I support Alternative 1 for NO CHANGE or exemptions to the Roadless Rule for Alaska.

The roadless rule was developed through extensive public process. As it now exists, it serves best to address all of the "Key issues" outlined in the DEIS:

* Key Issue 1, Conservation of Roadless Area Characteristics, is obviously easiest to address by retaining roadless areas. The Tongass is unique in that it contains possibly the largest contiguous areas of old growth temperate forest left in world. The roadless area is important to wildlife, recreation, traditional uses, and "long-term life support benefits to society as a whole." These are important concerns.

* Key Issue 2, Support for Local and Regional Socioeconomic Well-being is also better addressed by Alternative 1. Native tribes in Southeast Alaska do not support changes to the Roadless Rule, nor do most non-native residents. The DEIS states that "overall timber harvest levels are expected to remain unaffected by the final rule" under any of the alternatives, so it is difficult to see how a change will create more jobs for loggers and sawmill workers. Logging in our region is not profitable and has long been possible only if heavily subsidized by taxpayers; the cost to access and transport the logs is too high a price for buyers to pay. Fisheries and tourism jobs are much more important to the economies of Southeast Alaska communities, and the number of jobs that can be retained and created by keeping those industries healthy is much higher than the number of timber-related jobs that could possibly be supported. It would be much more beneficial to communities if the Forest Service would spend money on trails, cabins, and other visitor infrastructure, than on trying to serve wasteful and money-losing timber interests.

The idea that a rule change is needed to support communities' access for utilities, safety, and connectivity is invalid; exemptions now exist for those uses, and "nearly all new roads would be closed following logging".

* Key Issue 3, conservation of terrestrial habitat, aquatic habitat, and biological diversity, cannot be addressed by the building of roads. Roadbuilding damages habitat and water quality, and there are not enough funds available to maintain the 5100 miles of road that now exist, to prevent increased erosion and damage. With fish populations already stressed by ocean acidification and other impacts of climate change, even minimal impacts to healthy streams and spawning areas can be devastating.

The "preferred alternative" converts a net total of 165,000 old-growth acres and 20,000 young-growth acres to suitable timber lands. Every alternative except Alternative 1 increases the access to old growth forest, and the "preferred" Alternative 6 adds 59000 "suitable acres" of big tree old growth forests to be available for harvest.

Logging of old growth forest does the opposite of conserving important and unique terrestrial and aquatic habitat. Large old-growth trees can take 1000 years to replace, and the vast majority of high volume old growth has already been cut. The old growth that still remains is valuable for its unique habitats and support for biodiversity that it provides. It can only become more valuable in the future.

The DEIS downplays the potential negative impacts to the environment of the proposed rule changes. It underestimates the value of intact old-growth forests, while overestimating the theoretical benefits to socioeconomic well-being.

It also downplays climate change impacts and carbon sequestration, issues which are becoming increasingly crucial to the well-being of society as we know it. The Tongass is essential as one of the world's largest carbon sinks, and the amount of now carbon sequestered in large trees will be reduced if those are cut. It will actually take a very long time before that reduction is rectified by regrowth. Increased logging means increased carbon emissions during roadbuilding, cutting, milling and transportation of timber, as well as from the decomposition of waste wood.

It is unfathomable to me that Alternative 6 should be the preferred alternative, when there seems to be no real purpose other than a way for politicians to show that they are "pro development". The Tongass is our home and not simply a "resource warehouse" for the nation, as some have called it. Its "non-extractable" resources - clean air and water, habitat, a place to recreate and connect with nature for both residents and millions of visitors each year, and the thousands of jobs related to fisheries and tourism keep our region going - are much more important.

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