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Comments: As a supporter of Backcountry Hunters & Anglers and our wild public lands, waters and wildlife, I am very concerned with the proposed rulemaking announced in Federal Register Document Number 2019-0023. I am writing these comments to strongly encourage you to maintain roadless area protections for the Tongass National Forest, including the wild fisheries habitat in the Tongass 77 and adopt the no action Alternative 1. These public lands and waters are prized by sportsmen and women and are a mainstay of Alaska's economy, helping drive an $887 billion economic engine from outdoor recreation like hunting and fishing.
At nearly 17 million acres, the Tongass is the nation's largest national forest and the world's largest remaining intact coastal temperate rainforest; 9.3 million acres of that wild backcountry is inventoried roadless areas, providing high quality habitat for a unique diversity of sought-after game species, including mountain goats, black-tailed deer and both brown and black bears. The Tongass also encompasses thousands of miles of salmon-rich waterways, legendary among anglers and fundamental to the state's commercial salmon industry. The commercial fishing sector alone relies on the Tongass for more than 80 percent of its salmon and employs more than 4,300 people in the region, accounting for 9 percent of the area's entire employment. By contrast, timber production accounts for only 1 percent of the region's jobs.
Further, this proposal and the preferred alternative set a slippery precedent that threatens to unravel roadless rule protections for fish and wildlife across all of our nation's wild roadless forest lands. None of the identified alternatives take into consideration BHA's scoping comments to include balanced management policies for the Tongass, utilizing the 2001 Roadless Area Conservation Rule as a foundational benchmark for improvements so that any roadless policies only enhance the most important fish and wildlife habitats. Logging and timber harvest already co-exist with roadless areas in the Tongass after years of prior compromise and consensus-building.
I implore you to maintain the integrity of Alaska's roadless areas and the Tongass 77, critical watersheds for trout and salmon. The Roadless Area Conservation Rule is a collaborative management approach adopted following one of the most extensive public engagement campaigns in the history of federal rulemaking. It may be America's best and most popular land management rule ever. The costs to American taxpayers for road building and unconscionably subsidized resource extraction are too high - not to mention the irreparable impact to wildlife, water, subsistence practices and traditions like hunting and fishing.