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First name: Dr.

Last name: M. Cameron

Organization: Shee Atik&#225;, Incorporated

Title:

Comments: HC267

November 9, 2019

Dear Reviewer:

Shee Atik[acute], Incorporated, the Alaska Native Urban Corporation for Sitka which represents approximately 3,500 shareholders, many of whom live and work in southeast Alaska, offers the following comments in support of Alternative 6 in the Forest Service Draft EIS prepared under the National Environmental Policy Act. This alternative will exempt the entire Tongass National Forest from the Roadless Rule.

Our concerns are as follows:

1) The arbitrary way in which the Roadless Rule was mapped in the Tongass National Forest did not accurately account for all of the areas with roads, and did not adequately take into consideration the need for transportation links, access and rights-of-way for hydroelectric projects and interties, and access to known and potential mining prospects.

2) The social and economic hardships to Southeast Alaska imposed by the Roadless Rule outweigh the potential long-term ecological benefits, because the Tongass Forest plan adequately provides for the ecological sustainability of the Tongass. It takes every sector of southeast Alaska's economy to insure a sustainable total economy ?? the timber industry has repeatedly been hammered with setbacks in access to timber resources by multiple layers of legislative action, as well as opposition from special interest groups seeking to eliminate timber harvest in the Tongass National Forest.

3) The timber industry in southeast Alaska is in the process of transitioning from old-growth to the harvest of second growth timber ? this process is expected to take at least fifteen years ? and involve the re-tooling of the industry and require investment in new processing equipment and the development of markets for products different from those currently produced. In this transition, harvest of old growth as well as young growth timber will be necessary to prevent further declines in production and ensure that the current infrastructure (mills, harvesting contractors, transportation contractors, and forest roads) will remain enough to justify the necessary new investment.

4) The 2016 Forest Plan and Standards and Guidelines applied by the Forest Service staff when designing and laying out timber harvest units provide adequate protection to the fish and wildlife habitat, karst, and cultural resources. Significant volumes of old-growth and young growth timber are reserved from timber harvest by the creation of riparian buffers and other habitat protection measures. By some estimates, in the range of 30% to 40% of otherwise operable timber acres is not subject to harvest due to the application of the 2016 Forest Plan and Standards Guidelines.

I appreciate the opportunity to provide input in support of Alternative 6 in the Forest Service Draft EIS prepared under the National Environmental Policy Act, which will fully exempt the Tongass National Forest from the Roadless Rule.

Sincerely yours,

Shee Atik[acute], Incorporated

[Signature]

Dr. Kenneth M. Cameron

President/CEO

[Position]