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Comments: I appreciate the opportunity to comment on this proposed rulemaking action. I have read the Draft EIS and have studied this issue. I oppose the exemption of the Tongass from the Roadless Rule and feel the State of Alaska has not made a compelling argument for such a drastic action. It is clear from statements made by President Trump and by the Alaskan Senators and Representatives that this action is requested so that the Tongass National Forest resources can be exploited. Specifically, Alaska wants to build roads in the Tongass to enable old growth tree harvest and mining operations. When it is so clearly obvious that this action is needed to build roads, why does the Draft EIS not fully consider the impact these roads will have?

The Draft EIS is inadequate for the following reasons:

1. It over-complicates the analysis by examining too many distracting alternatives that have not been requested or recommended.
2. It obscures the real impact of the proposed action by devoting most of the narrative to the non-preferred alternatives. The proposed alternative is analyzed last and therefore given the least analysis, and consequently the determined reader is mentally exhausted upon reaching this analysis.
3. The Executive Summary does not adequately summarize the actual environmental impact of the preferred alternative. For example, in Key Issue 1-Roadless area conservation, all that is effectively stated for Alternative 6 is that it removes all acres from regulatory roadless designation. In fact there are only three references to Alternative 6 in this section, which state "Alternative 6 provides the lowest with zero acres of designated roadless given regulatory prohibitions", "under Alternative 6, the 2001 Roadless Rule would fully exempt the Tongass", and "Alternatives 4 through 6 would provide the least amount of roadless designations, with Alternative 6 removing all acres from regulatory roadless designation". There is no mention of the environmental impact this will have. This does not tell governmental decision-makers anything other than what has already been requested by the State of Alaska, e.g. exempt the Tongass from the Roadless Rule. (It should be noted that this is not value for our taxpayer dollars.)
4. It makes unsupported and false statements. For example, in the Executive Summary Key Issue 3, under Old Growth Habitat, the statement is made "Relative to old-growth habitat conservation, all of the alternatives would have old-growth harvest levels similar to the level authorized by the 2016 Forest Plan". Historical evidence in the U.S. suggests that when and where roads can be built they eventually will be built, and that with removal of the Tongass from the Roadless Rule, more roads will be built, which will open up more old growth acres to harvest potential. The Draft EIS states here that "There may be slightly more high-volume and large-tree productive old growth (POG) harvested under the action alternatives than was predicted for the Forest Plan because of the increased options for creating economic timber sales. However, this is speculative and depends on harvest levels reaching predicted decadal levels, as well as on being able to economically access these stands". It should be recognized that the expectation of an EIS is that it will make a reasonable effort to predict the potential impacts to the environment of the proposed action, and not to speculate. It is clear that construction of roads will indeed make it more economical to harvest trees. This is not a speculation, it is fact. Speculation is the forming of a theory or conjecture without firm evidence. The EIS must predict the future impact of a proposed action based on evidence.
5. It under-estimates the environmental impact of the proposed action. The Draft EIS evaluates the impacts of the alternatives based on the flawed assumption that existing regulations and State-specific rulemaking will adequately protect the Tongass from future environmental harm. However, it must be recognized that once the

Tongass is exempted from the Roadless rule, the other regulations in place can also be changed. If the Tongass is removed from the Roadless Rule, those who opposed this action will be disheartened and less inclined to comment on future rulemaking, having lost this battle once already. Additionally, State-specific rulemaking effectively removes the rulemaking analysis from National examination and will not guarantee that National concerns are addressed. Therefore, this proposed action will have a huge impact on removal of the protections that the Tongass currently enjoys. This will lead to huge negative environmental impact to the Tongass.

6. It does not adequately address the proposed alternative's impact on global warming in respect to the current and future pace at which will reach the 1.5 degree Celsius warming threshold set by the Paris Agreement.

7. It does not adequately address, and does not attempt to quantify, the full impact of wildlife harassment through road kill, noise pollution, and obstruction of natural movement routes.

8. The Draft EIS does not consider the stated goals and objectives of the current U.S. Administration and Alaska lawmakers in predicting future environmental impact of this action. While it is technically accurate that none of the alternatives authorize any site-specific projects, the EIS must take into account the stated objectives of the current U.S. Administration and Alaska lawmakers whose goal is to develop the land for resource extraction in the interest of the economy of Southeast Alaska. This would in effect be a taking of a precious national resource from many for the financial benefit of few. A review of Senator Sullivan's recent press release clearly reveals the intent of the State of Alaska to exploit the Tongass, and does not hide the fact that they are currently hindered in that effort by the Roadless Rule. In this release Senator Murkowski states the "Roadless Rule hinders our ability to responsibly harvest timber, develop minerals, connect communities, or build energy projects to lower costs-including renewable energy projects like hydropower" and Rep. Young states "I am optimistic that this decision will allow for proper management of the Tongass to provide opportunities for tourism, fishing, and wildlife viewing as well as mining, energy development, and timber" (emphasis mine). Interestingly, wildlife viewing is already possible in the Tongass, and can continue and increase without additional roads, whereas there is a high probability that roads will have negative impacts on native wildlife and endangered species, making their viewing more difficult. Additionally, roads will enable the harvest of old growth trees, thereby destroying a non-renewable resource, and reduce a vital carbon sequestration asset. Exempting the Tongass from the Roadless Rule removes the first and biggest hurdle in the race to exploit the Alaskan natural resources.

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