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Comments: I encourage the USDA to fully exempt the Tongass National Forest from the Roadless Rule.

The Roadless Rule was adopted in the final days of the Clinton Administration and came, belatedly, on the heels of a thorough analysis of the Tongass through a rigorous revision to the Tongass Land Use Management Plan. The USDA itself stated during the Roadless rulemaking process:

The Department has concluded that the social and economic hardships to Southeast Alaska outweigh the potential long-term ecological benefits because the Tongass Forest plan adequately provides for the ecological sustainability of the Tongass. Every facet of Southeast Alaska's economy is important and the potential adverse impacts from application of the roadless rule are not warranted, given the abundance of roadless areas and protections already afforded in the Tongass Forest Plan.

There exists today no less of an abundance of roadless areas and protections already in place on the Tongass. Elimination of the rule from the Tongass provides the opportunity for energy, transportation, mining, logging, and many other uses of the forest that cannot practicably exist with the roadless rule in place. While the Roadless Rule ostensibly provides for a range of activities, in practice roadless areas in the Tongass are nearly out of reach to uses short of those that are Wilderness in nature.

In addition, elimination of the Roadless Rule on the Tongass will not result in a lack of environmental standards applicable to activities in the forest. Given the extensive range of federal statutes, regulations and practices in place that govern uses in the Tongass, and that preexisted the Roadless Rule, the rule is superfluous to proper management of the forest, not essential to it.

The forest is certainly capable of supporting industries that are sometimes considered incompatible. A prime example of this is logging and tourism. There are more clearcuts and young growth areas on the Tongass today than there have ever been. At the same time, the tourism industry in Southeast Alaska continues to grow. Recent projections for the coming tourist season show that in 2019, a record number of tourists will come to Southeast Alaska, part of a trend of increasing tourist traffic that, with the exception of the years immediately following the start of the last recession, goes back more than a decade. While some tourism industry representatives and others frequently parrot the phrase "Tourists don't come to Alaska to see clearcuts", it is demonstratively true that clearcuts don't keep tourists from coming to Alaska.

I have heard on many occasions those advocating for more restrictions on human activity in the Tongass claim that the area is the "crown jewel of the national forest system." That claim may well be true. And if the Tongass can be claimed to be the crown jewel of our nation's national forests, after decades of commercial logging, mining, roadbuilding, and other development, then the "crown jewel" claim is a ringing endorsement of a multiple use approach of forest management that permits continued development and conservation of the forest, and provides the greatest possible benefit for its communities, flora, and fauna.

The Forest Service should fully exempt the Tongass from the Roadless Rule, and provide for management of the forest using the many other practices in place prior to implementation of the rule.