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Organization:

Title:

Comments: Support No-Action Alternative 1

I support the No-Action Alternative for the Draft Environmental Impact Statement on the proposed Alaska Road Less rule, Alternative #1. This will keep the vital road less protections intact. It is time to stop opening more and more acres to the timber industry and instead bolster protections to the old-growth forests and wild areas on the Tongass. Under the proposed modification to the rule, 9 million acres are open to old growth clear cut logging, and also to the devastating transection and segmentation by roads.

The Tongass is our largest National Forest and is essential to addressing the climate crisis. Further, an intact Tongass National Forest is vital to maintain the economic, cultural, and ecosystem health benefits of biodiversity

The decision making process on this rule appears to be flawed and in violation of proper procedures and the Administrative Procedure Act since there are troubling concerns that:

- (1) Misdirection of funds, since funds used for the flawed environmental analysis were actually allocated instead for helping communities prevent and suppress wildfires;
- (2) More than \$200,000 of the grant being given to the Alaska Forest Association, a timber industry group as it lobbied to open up access to Alaska's Tongass National Forest;
- (3) The state of Alaska appears to have excluded groups that opposed opening up the forest to logging.

The proposed modification targets the most productive trees, the old growth trees. Although previous logging has cut only about 9% of the trees, 50% of the old growth trees have been harvested. Without the road less rule protection, the increased access will devastate the old growth trees. These trees are the keystone to the vital unlogged watersheds and ecosystems with high wildlife, fishery and recreational value. The Tongass supports economically, culturally and nutritionally valuable species such as the Pacific Salmon. Tourism will be negatively impacted harming the regional economy.

The temperate forests of Alaska that will be negatively impacted by this amendment are some of the largest carbon sinks. Logging under this amendment will quickly release immense amounts of carbon. Older forests sequester far more carbon than younger forests since trees carbon absorption rate increases as it ages. Replacing the less dense old growth with the larger numbers of dense new growth will only release more carbon. Logging of old growth will also increase erosion, decrease water quality and importantly increase fire risk.

Under this proposed modification, the Chugach National Forest is also targeted. This plan gives the regional

forester the ability to remove Roadless Rule protections from any of the currently protected 5.4 million acres in the Chugach, with no analysis of impacts and extremely limited public comment.

You kill the soul of a forest by cutting it into pieces. What is left provides no real or sustainable economic gain, but instead a loss for America's future generations.

Support Alternative 1, which keeps the current Road Less rule in place.

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