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Organization:

Title:

Comments: December 17, 2019

Dear Secretary Perdue and Chief Christensen,

I am writing today to strongly urge the U.S. Forest Service not to exempt any portion of the Tongass National Forest from the 2001 Roadless Rule. For the record, I support Alternative 1 the "NO ACTION" alternative. Please keep the 2001 National Roadless Rule on the Tongass.

My name is Michael A McKimens. I am a 35-year resident of Craig Alaska located on Prince of Wales Island. My past work experience is as follows: former Craig Public Works Director (1984-2004), former Project Manager/Inspector (1985-2015), and former Owner Operator of Outer Coast Adventures, LLC (2005-2016) a marine transportation business. Now fully retired, I've seen a lot of changes over the decades here in Craig and all over Prince of Wales Island. Not all this change is has been good. Years or should I say decades of unsustainable industrial scale logging on Prince of Wales Island has decimated Tongass Old Growth timber. Most of the low elevation riparian Old Growth has now been logged. Only 6% of the Old Growth Timber remains on POW, locally known as 'Ground Zero for the Forest Service Tongass Timber Program.

The Tongass National Forest is known as the "crown jewel" of our national forest system and for good reason:

- * The Tongass is the largest National Forest in the United States at nearly 17 (16,700) million acres;
- * It is part of the largest remaining Temperate Rain Forest in the world that once stretched from northern California, thru Oregon, Washington, British Columbia and ending in Southeast Alaska;
- * According to the World Wildlife Fund, "More than a quarter of the world's coastal temperate rain forests occur in the North Pacific coastal forests ecoregion of southeast Alaska";
- * Not only is the Tongass a National treasure, it's a Global Treasure as the largest temperate rainforest in the world; and
- * This type of ecosystem is not only rare, but also highly valuable to wildlife. "Old-growth temperate rainforests hold more biomass (living stuff) per acre than any other type of ecosystem on the planet, including tropical jungles." The Tongass hosts deep forests of old-growth cedar, spruce and hemlock trees, some of which are more than 1,000 years old, as well as blueberries, skunk cabbages, ferns, mosses and many other plants in its understory.

An Alaska State specific exemption to the Roadless Rule would allow 165,000 acres of old-growth forest to be clear-cut. Read: the best of what is left. This will further threaten wildlife, fish habitat and the fisheries they support. Any decision to remove the rule goes against years of collaboration between the U.S. Forest Service the Southeast Alaska Tribes, outdoor recreation, tourism, and fishing interests and local community members.

The Forest Service lost 600 million dollars on timber sales over the last 20 years. That is an average of 30 million per year of taxpayer expense to support a few local jobs. Removing the Roadless Rule will ensure the destruction of the remaining Tongass Old Growth forest at ever more taxpayer expense. That makes no economic or ecological sense. If the large scale timber industry has to be subsidized year after year maybe it is not a viable industry.

Climate scientists say that protecting mature forests is just as urgent as halting fossil fuel use, since big, old trees trap far more carbon pollution than younger, second-growth forests. And few forests on the planet play a greater role than the Tongass in helping to mitigate climate change. The Tongass retains more atmospheric carbon than any forest in the United States, according to Dominick DellaSala, chief scientist with the Geos Institute, a think tank in Ashland, Oregon. "Because it is one of the world's last relatively intact temperate rainforests, and it has a maritime climate, the Tongass is Alaska's first line of climate change defense and a climate refuge for its world-class salmon and wildlife populations," he says.

The argument that the existing 2001 Roadless Rule stifles rural economic development doesn't hold water. It's the same old scare tactic that some residents espoused when the mills closed down in the 90s. Ketchikan and Sitka will dry up and go away. Jobs will be lost, real estate values in the toilet, small rural communities will not exist anymore, etc. Not true. Did not happen. The existing Roadless Rule allows for important community exemptions such as: hydroelectric projects, construction of power lines, transportation corridors, mineral leases and others. It does not stifle the economy. The 2001 National Roadless Rule is well designed and flexible enough to allow for access and certain development projects. Since 2009 48 projects have been approved in the Tongass, the majority relating to surface exploration of potential mining and hydropower plus electric transmission corridors. The Forest Service has also taken steps to expedite this approval process, now taking only one to three weeks for approval.

Removing the Rule will increase rural economic development. That statement is more untruths by development fanatics. Today timber represents less than 1% of regional employment. Tourism is the area's biggest business, employing more than 10,000 people and driving more than a billion dollars in economic impact each year. While the seafood industry and tourism account for 9% and 15% of regional employment respectively. The same intact forest ecosystems that inspire hundreds of thousands of tourists to visit also provide the important habitat for salmon spawning. It is clear that a sustainable economy for SE Alaska depends on its intact old-growth ecosystems, not more logging.

There is a limited supply of accessible Old Growth in Southeast Alaska. Viking Lumber refuses to cut second growth. Should we let Viking cut the remaining Old Growth? I think not. The mill needs to transition to young growth now or go away, simple as that.

Do not ignore the wishes of the American public. As of today tens of thousands of Americans have commented to leave the successful 2001 Roadless Rule in place on the Tongass.

However, this entire process is driven by politics and not science. I object to that. It's not the way to manage public lands. These lands belong to all Americans. These lands contribute in untold ways to climate, environment, quality of life, and economic opportunity like fishing, subsistence and tourism. Q: Why can't people learn from past mistakes? Do you want Southeast Alaska to look like the Pacific Northwest? Where salmon are threatened and endangered, forests are monocultures with only little pockets of standing Old Growth forest left?

Oh, did I mention the Tongass National Forest is the last forest in the nation that allows clear-cut logging. Why is that?

Again, I strongly urge you to select the "No-Action" alternative on the Alaska-specific Roadless Rule and keep the 2001 National Roadless Rule in place on the Tongass.

Thank you for the opportunity to comment.

Sincerely,

/s/ Michael McKimens

[POSITION]