Data Submitted (UTC 11): 12/17/2019 9:00:00 AM First name: Benjamin Last name: McLuckie Organization: Title: Comments: Good Day,

I found the public and subsistence meetings on the Roadless Rule on November 14 at the Hoonah District Ranger Station to be most informative and confirming. I found myself in support of all the diverse points of view presented by members of the Hoonah community presented in those meetings. As diverse as the presenters were, the common thread contained in all was an impassioned plea to prioritize the viewpoints of those who actually live amongst the Tongass forest, the very people who are most affected by your decisions. Much of what I heard I could have said myself.

You have managed to put the community of Hoonah strongly on the defensive with your preferred Alternative 6. It is apparent from the timeline of the decision making process and the actual radical decision proposed by you that your rulemaking process is an upside down, from the top approach that fails to take into account how the residents of Hoonah actually live in this great forest.

We are already many years into local management of the Hoonah Community Forest, a diverse partnership of stakeholders (USFS included) that seeks to manage the forest across all the diverse uses of community members. Successful partnerships require best-intent efforts from all parties, but in return those efforts are rewarded with management that is responsive to Hoonah, dynamic in outcomes and represents the most benefits for the widest range of interests.

Instead of local management, your preferred alternative represents bully politics and an absence of sciencebased natural resources management, community-based public policy, or mandated subsistence activities. I found much of the DEIS problematic, for example, when you claim full exemption would have "negligible" effects on fish habitat. The outcomes of your preferred alternatives work against Hoonah's management of our community forest. For most of us, Hoonah will be poorer, with less economic opportunity and more environmental impacts. The emotional health of Hoonah's residents are at-risk here, as any threats to our forest pose a threat to our well-being.

My strong preference is for Alternatives 1 or 2, or 3 only if Hoonah was added to the list of Community Priority Areas. These alternatives keep existing regulatory protections for all key watersheds inside roadless areas and convert a carefully targeted amount of old-growth for minimal environmental impact. Alternatives 4, 5 and 6 convert far too much old-growth acres to timber lands, build too many new roads required for these harvests, and make these selections without regard to community priorities. Neither the State of Alaska nor the USDA have shown they understand the issues at play here.

Thank you for your time and any considerations of those most affected by this action.

Ben McLuckie

27 year resident of Hoonah

24 years of teaching biology, natural resources, earth science and more at Hoonah High School,

Forest resident for recreation, subsistence, sport

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